

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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United States of America

Crim. No. 18-499 (LAK)

v.

Midence Martinez Turcios,

Defendant.

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DEFENDANT MIDENCE MARTINEZ TURCIOS'S SENTENCING SUBMISSION

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TABLE OF CONTENTS

I.	Introduction	1
II.	Background.....	3
A.	Mr. Martinez’s Difficult Childhood in Rural Honduras	3
B.	Education and Military Service	3
C.	Mr. Martinez’s Efforts to Improve His Community as a Congressman	4
D.	Mr. Martinez’s Life in Honduras after Congress	6
E.	Mr. Martinez’s Devotion to His Family	7
F.	Mr. Martinez’s Arrest, Extradition and Detention at the MDC	9
III.	The Offense Conduct and Guidelines Calculation.....	10
A.	The Cachiros	11
B.	Mr. Martinez’s Role in the Offense	13
C.	Objections to the Presentence Report	15
D.	The Guidelines Calculation.....	15
IV.	The 3553 Factors Warrant a 144 Month Sentence.....	16
A.	Mr. Martinez’s Role in the Offense Warrants the Requested Sentence	17
B.	The Need to Avoid Unwarranted Sentencing Disparities.....	20
C.	Mr. Martinez’s History and Characteristics Warrant the Requested Sentence.....	22
D.	Mr. Martinez’s Age and Medical Conditions Warrant Leniency	23
E.	The Harsh Conditions of Mr. Martinez’s Confinement To Date Warrant Leniency	24
F.	A Substantially Below Guidelines Sentence Would Be Sufficient for Deterrence and Punishment.....	25
V.	Conclusion	26

I. Introduction

On September 4, 2025, Defendant Midence Oqueli Martinez Turcios will be sentenced by this Court for his role in assisting members of the Cachiros drug trafficking organization with transporting drugs through Honduras to the United States.

Now 64-years old, Mr. Martinez was a lifelong resident of Honduras before his extradition to the United States in March 2023, as one of dozens of Honduran politicians, police officers and businessmen brought before United States courts to be prosecuted for their roles in trafficking drugs to the United States. Mr. Martinez was raised in poverty in the small rural village of Zamora in the Department of Colon, as the eldest of 15 children, and he began working long hours on his family's farm when he was seven years old, before overcoming the odds to obtain an education, enter the military, run a small family business and eventually become a two-term Congressman for the minority Liberal Party in Honduras.

Regrettably, when he decided to pursue a career in politics, Mr. Martinez succumbed to the pervasive culture of political corruption in Honduras. His distant cousins, Devis Leonel Rivera Maradiaga and Javier Heriberto Rivera Maradiaga, leaders of the Cachiros, a notoriously violent drug trafficking organization, offered to fund his political campaigns, and Mr. Martinez accepted their assistance knowing that he would be indebted to them. Nonetheless, as letters to the Court from Mr. Martinez's constituents and colleagues in politics show, Mr. Martinez entered politics with a genuine hope of improving conditions for his low-income community, and he succeeded in making a meaningful difference in his district by helping build roads, schools and churches, installing electricity in poorly lit areas to improve safety, and providing food, shelter, medicine and transportation to hospitals for those in need.

Undeniably, Mr. Martinez will be sentenced for exceptionally serious crimes, including assisting the Riveras in the importation of more than 450 kg of cocaine via aircraft to the United States as part of a conspiracy in which firearms were used. Following a *Fatico* hearing, this Court also credited the testimony of cooperating witness Leonel Rivera, and found by a preponderance of the evidence that Mr. Martinez participated in violence in Honduras with the Cachiros, including planning and participating in multiple shootings.

For these serious offenses, Probation has recommended a sentence of 360 months. But as detailed below, such a sentence, which at Mr. Martinez's age would effectively be a life sentence, would result in a significant unwarranted sentencing disparity between Mr. Martinez and multiple high-ranking Honduran defendants who were sentenced before judges in the Southern District of New York, and who received substantially lower sentences, including those who served in much higher positions of power than Mr. Martinez in Honduras, who played more critical roles in drug-trafficking, and who were found to have participated in comparable if not greater acts of violence in Honduras. The defense thus submits that a substantially below-Guidelines sentence of 144 months of imprisonment, which would be commensurate with sentences imposed for similarly-situated defendants, is warranted.

Such a sentence would be sufficient but not greater than necessary to serve the goals of sentencing taking into account Mr. Martinez's relative culpability, his age and serious medical conditions, the positive contributions he has made to his community and his family, the hardships he has faced and will face being imprisoned so far from his family and his native country, and the fact that the most serious conduct for which he will be sentenced was only proven by a preponderance of the evidence.

Attached in support of Mr. Martinez's sentencing submission please find: Exhibit A, a chart of sentences of other Honduran defendants; Exhibit B, letters from Mr. Martinez's colleagues, friends and constituents, attesting to his positive contributions to his community; Exhibit C, letters from Mr. Martinez's family demonstrating the devoted role he has played in supporting his mother, his children and his wife and her family; and Exhibit D, a letter showing the positive contributions Mr. Martinez has made at the MDC.

II. Background

A. Mr. Martinez's Difficult Childhood in Rural Honduras

Mr. Martinez was born on October 10, 1960 in a small rural village, Zamora, in the Department of Colón in Honduras. The oldest of 15 children, he was raised in poverty, in a home with no electricity or running water on his father's cattle farm. PSR ¶ 69. Since Mr. Martinez's father did not have enough money to hire help, the family worked the land together, and they ran a small mini-mart selling rice and beans. Starting at age 7, Mr. Martinez would rise early to help his mother milk the cows at 5 am before attending school, and he would corral the cows after school, working into the evening.

In 1977, due to a tragic accident, the family's home and minimart were completely destroyed by a fire, and it devastated the family financially, and it took the family over a decade to rebuild. Agrarian reforms further dealt a financial blow to the family, as the land they owned was seized and redistributed to a cooperative, and the family had to move their farming to less fertile, mountainous land, which made it even more difficult to make ends meet.

B. Education and Military Service

As the oldest child, Mr. Martinez's parents arranged for his education with the hopes that he could improve the family's prospects. When Mr. Martinez was an adolescent, they sent him to attend school for two years, in La Ceiba, Atlantida, Honduras, and thereafter he went to live with

an uncle to attend high school in San Pedro Sula, Cortes, Honduras. Since the roads were treacherous between Zamora and San Pedro Sula, Mr. Martinez was isolated from his family, and only able to travel home during vacations, when he would continue to help his family work the farm.

Mr. Martinez graduated from high school in 1982, and thereafter rejoined the family business, working alongside his family, including planting and harvesting cornfields, cutting palm, and butchering pigs. He also worked to help his father rebuild their home and family business.

Mr. Martinez then entered the military in 1988, earning a bachelor's degree in business from the Autonomous de Honduras Escuela Militar, a military school in Tegucigalpa and thereafter served with honor in the Honduran military until 1996, when he left with the rank of lieutenant to devote himself to working on his family business.

Mr. Martinez also opened a trucking business and a hardware store in 1996, both of which he operated with his then-partner, Hilda Concepcion Aguilar, with whom he shares five children.

C. Mr. Martinez's Efforts to Improve His Community as a Congressman

After Mr. Martinez worked for several years to get his family back on track financially, he developed an interest in getting involved in politics to improve the conditions in his community. Despite the offense conduct, discussed more fully below, Mr. Martinez entered politics with the genuine hope that he could help advocate for improvements to the lives of members of his rural community. Members of his community, including those who worked alongside him, attest to the positive impact he had on his community, before, during and after his time in politics.

Jorge Alberto Morales, President of the Board, in La Bolsa, Tocoa, Colón, writes of Mr. Martinez's positive impact on his community:

Even before he was a congressman, [Mr. Martinez] provided financial assistance, supporting different low-income individuals in our community and when he was a

congressman, he helped us repair the street in our community and Colonia. He also helped us when low-income individuals needed a coffin when a family member had passed away, or food for the wake. He helped us with repairs to the school and the kindergarten. He also helped us with materials to build the concrete entrance to the street. He was a person who also helped in personal situations.

I remember when he provided all the electrical materials for a house that had suffered a fire to a family that had lost everything. I also remember another time when he helped people who needed surgery, who needed an ambulance. After God, he was the support of our community. Every time there was someone in need, I would look for him. He always answered the phone; if he was in Tegucigalpa at the national congress, he would answer and tell me: "Mr. Jorge I will be in Tocoa this weekend, come to my house and I would do so," and there he was to assist me and help me resolve the needs of the people in the community. He was the one who helped us with provisions, food and many more things during times of flooding.

Ex. B at B3.

Abraham Medina Zelaya, a lifelong friend of Mr. Martinez, describes for the Court, not only his friendship with Mr. Martinez, but the work they did together when Mr. Zelaya was the President of the Board of Zamora. He notes that he and Mr. Martinez "made projects like 2 kilometers of street lighting of Zamora, he also made the perimeter fence of the soccer field, he made a basketball court, helped churches and many people." *Id.* at B13.

Hector Evelio Ramierz Paz, who has known Mr. Martinez since 1985, writes that during his time in politics, Mr. Martinez, "did many works for the benefit of health, education, and generated jobs and housing for people in need of a home, improved housing, and carried out productive infrastructure works in the rural area of our sector." *Id.* at B24.

Héctor Rolando Hernández Cruz, who has known Mr. Martinez for decades, notes that:

Between 2014 to 2018, we had the opportunity to be fellow congressmen in the National Congress for different political parties, with Midence being one of the congressmen with impeccable conduct, disciplined, respectful, friendly, and admired by all, because he presented several bills to benefit all citizens of the sector of Colón.

Id. at B15.

Denis Javier Hernández Vázquez, one of Mr. Martinez's constituents, who has known Mr. Martinez since 2010, writes of Mr. Martinez's friendship and service to the community:

As a friend, he was very kind, as he always helped us when we requested assistance for school, for the elderly, for the sick, for the hungry, and for churches. He always collaborated, and what he taught us the most is that we should always pray to God for any purpose in our lives. Martínez Turcios donated paint to us to paint canoes for artisanal fishermen, and in our community, he helped many elderly people by providing food and medicine, since they had no one to help them. In school, he helped a lot for Children's Day with piñatas, sweets, cakes, and he helped the humblest people by finding them sources of work.

Id. at B6.

Elin Obed Acuña, now the Municipal Mayor of Saba Colón, who has known Mr. Martinez since 2003, and with whom Mr. Martinez overlapped in politics, describes Mr. Martinez as “a leader who was always concerned about his people and his friends, a man who sought the unity and the well-being of all. He worked on many projects while he was a congressman. He helped many people, institutions, and churches.” *Id.* at B18.

Pastor Samuel Fajardo, pastor of a local church in Honduras, writes of knowing Mr. Martinez for 15 years, and first meeting Mr. Martinez when Mr. Martinez stopped to help him change a tire on the side of the road. *Id.* at B8. Pastor Fajardo explains that Mr. Martinez helped get financial assistance for his church, and he helped build the church's roof. *Id.*

During his time in Congress, Mr. Martinez also continued to work in farming. His wife Heidy Lisseth Miranda Trigueros, whom he wed in 2022, explains that Mr. Martinez would return home from Tegucigalpa on the weekends, and they would work together to raise pigs, and plant grass for the animals and watermelon to sell. Ex. C at C6.

D. Mr. Martinez's Life in Honduras after Congress

When Mr. Martinez left Congress in 2018, he lived modestly, living in his wife's mother's home before the couple rented a home of their own in 2022. *Id.* Heidy explains that, “By the year

2018, when he was no longer a congressman, the routine was to get up at 5 in the morning to go to work in the field, returning at 5 in the afternoon, having dinner, chatting, watching television and sleeping and that was our normal life.” *Id.*

E. Mr. Martinez’s Devotion to His Family

Mr. Martinez’s partnership with Ms. Aguilar ended in 2009, when she began having an affair. Mr. Martinez, hurt and humiliated but devoted to his children, gave both businesses and their family home to his ex-wife, with whom his children lived, keeping only two trucks for himself.

As letters from Mr. Martinez’s children show, despite their parents’ separation, Mr. Martinez has been a devoted, present father to his children. Mr. Martinez’s daughter, Andrea Rachell Martínez Aguilar, writes of the strong daily presence Mr. Martinez was in her life prior to his arrest, and how she longs for his return to Honduras. She explains that her father “taught me to study, to work, to ride a horse, to be disciplined, to be polite, and be a dreamer.” Ex. C at C28. She writes that she will “pray every day of my life to see him again.” *Id.*

Mr. Martinez’s youngest son, Josue, writes that Mr. Martinez “has always been present in the most important moments of my life,” including taking Josue to kindergarten. *Id.* at C33. As Josue describes, when he was scared to stay in kindergarten Mr. Martinez “stayed there all day waiting for me to finish all my classes. He would stay outside the classroom, sitting in a chair reading the newspaper, while I finished classes, so that I wouldn’t be afraid.” *Id.* Josue begs the Court to “return my dad to me.” *Id.* Mr. Martinez’s daughter Tania writes that since her father’s detention, “Every day, I feel that I am missing a part of me.” *Id.* at C16.

Mr. Martinez’s wife, Heidi, writes in her letter of Mr. Martinez’s devotion to his mother, sisters, and children, describing him as a “family man, a father like few who sought to spend time

with his children and teach them to work and his children had the confidence to talk about all kinds of subjects with him.” Ex. C at C6. [REDACTED]

[REDACTED]. *Id.* She writes that when he was a congressman, he “never advertised” the good works that he did for the community because the receipt of recognition was not important to him. *Id.* When she was studying to obtain her architectural degree, Mr. Martinez always supported her and encouraged her to pursue her degree even when she thought about stopping; Heidy writes, “he always encouraged me to continue, that every sacrifice had a reward, he always taught me to persevere, to fight for my dreams, to believe in myself.” *Id.*

Mr. Martinez has also been an important caregiver to his ailing mother, who is currently in a wheelchair. Mr. Martinez’s mother, Emilia Turcios Rosales, writes of how close she is to her son, Mr. Martinez, [REDACTED]

[REDACTED] *Id.* at C11. Then, after her husband died in 2013, Mr. Martinez became an even greater support to her and his younger sisters. *Id.* [REDACTED] Mr. Martinez “is the son who has always been attentive to [her], he was the one who took [her] to the doctor and who was always concerned about [her] health.” *Id.*

Mr. Martinez’s sister, Sandra Ivette Martínez Turcios, writes of the strong presence her eldest brother was in her life, and the tremendous toll Mr. Martinez’s extradition has taken on their mother, writing “my mother cries out to God to see him again since she is in a wheelchair, [REDACTED]

[REDACTED] *Id.* at C35.

Since his extradition to the United States in March 2023, Mr. Martinez has not been able to see his wife, his mother or any of his children in person. Particularly given how close Mr. Martinez is with his family, and how much they have relied upon him for support, his absence from their lives has been excruciating, both for them and for him.

F. Mr. Martinez's Arrest, Extradition and Detention at the MDC

Mr. Martinez was arrested for this offense in December 2022 and held in custody in Honduras until his extradition in March 2023. The circumstances surrounding Mr. Martinez's arrest in Honduras were harrowing. Mr. Martinez's wife Heidi describes how, when Honduran police came to arrest Mr. Martinez, hooded men dressed in civilian clothes got out of the car and started shooting at them, and she feared that they were kidnappers. Ex. C at C7. In addition to being distraught that Mr. Martinez was extradited and she can no longer see him in person, Heidi has been traumatized and has had recurring dreams about the shooting. *Id.*

Since his extradition in March 2023, Mr. Martinez has been detained and has endured exceptionally harsh conditions of confinement at the Metropolitan Detention Center ("MDC") in Brooklyn.

Since Mr. Martinez has been detained at the MDC, violence has repeatedly erupted, including right in front of Mr. Martinez, leaving him continuously on edge and in fear for his safety. An inmate was stabbed by another inmate right in front of Mr. Martinez's cell. Mr. Martinez observed another group of inmates trying to decapitate another inmate with a fan, a horrific fate, which was avoided only because the plug for the fan did not reach far enough. When Mr. Martinez was working as an orderly, he also witnessed an inmate brutally attack a guard in the bathroom. The recurring violence at the MDC has not only been deeply distressing to Mr. Martinez but it has resulted in numerous lockdowns.

Due to his age and the language barrier, Mr. Martinez has also been socially isolated, and he has had very limited ability to participate in programming, which is only offered in English. Mr. Martinez attended the few programs made available to him with the assistance of inmates who helped translate the material for him. Since completing these courses, though, he has been unable to participate in other programming due to the long waiting lists and the lack of availability of Spanish-language programming.

Mr. Martinez is also suffering from a number of serious health ailments, which have been inadequately treated at the MDC. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Despite these hardships, Mr. Martinez has incurred no disciplinary infractions, and he has found a sense of purpose. Relying upon his deep faith, Mr. Martinez has been working as a Pastor to other Spanish-speaking inmates at the MDC. Twenty-two Spanish-speaking fellow inmates have signed on to a letter to the Court, writing about the positive influence Mr. Martinez has made in their lives as a Pastor, including encouraging them to repent and change their ways. *See Ex. D.*

III. The Offense Conduct and Guidelines Calculation

Regrettably, Mr. Martinez's interest in politics brought his distant cousins, Leonel and Javier Rivera, more prominently into his life. Leonel and Javier Rivera were the leaders of the

Cachiros drug trafficking organization, which the Government describes as “one of the largest and most violent drug trafficking organizations in Honduras, responsible for trafficking more than 100 tons of cocaine to the United States between approximately 2003 and 2013 and dozens of drug-related murders.” PSR ¶ 23. Although Mr. Martinez only saw the Riveras sporadically in his childhood, when Mr. Martinez began getting involved in politics, the Riveras reached out to him, believing his contacts and political position would be useful to the Riveras. Mr. Martinez’s role in the offense must be viewed in the context of the vast reach of the Cachiros drug trafficking organization in Honduras.

A. The Cachiros

As Leonel Rivera has testified in multiple proceedings, including the *Fatico* hearing before this Court, to facilitate their drug trafficking, the Cachiros paid bribes to politicians at all levels of the Honduran government, in both major Honduran political parties, the National and Liberal parties, up to and including Porfirio Lobo Sosa, the President of Honduras from 2010 to 2014, his son, Fabio Lobo, Juan Orlando Hernandez, the President of Honduras from 2014 to 2022, and his brother, Tony Hernandez. Fabio Lobo, Tony Hernandez and Juan Orlando Hernandez, members of the National party, have all been convicted and sentenced in the Southern District of New York, including for their roles in accepting bribes from the Riveras and other drug traffickers, and for their roles in facilitating drug trafficking. *See, e.g.*, PSR ¶¶ 11, 15; 12/12/24 Hr’g Tr., ECF No. 45, *id.* at 20:18 – 21:5 (Rivera’s testimony that he bribed officials of both major Honduran political parties).

To receive drugs in Honduras, the Cachiros partnered with landowners, who owned and controlled airstrips, and airplanes carrying cocaine would land on these airstrips throughout Honduras. The Cachiros would also use multiple groups of heavily armed security teams to unload the cocaine and transport it across Honduras to Mexico, after which the drugs would be transported

to the United States. Among the groups the Cachiros used for armed security were members of the violent gang, MS-13, members of the Honduran National Police (“HNP”), the government body charged with enforcing Honduran drug laws, and armed security provided by drug-trafficking partners. *See, e.g.*, PSR ¶ 22 (noting the Cachiros used the HNP to provide heavily-armed security.); 12/12/24 Hr’g Tr., ECF No. 45, at 80:4-16 (Rivera testifying that MS-13, a violent gang which had access to “heavy-duty weapons,” helped protect cocaine shipments.); *Id.* at 20:7-11 (“We had several groups who provided transportation. I was in one. My cousin Midence was in it with my brother, and we had other groups.”); *United States v. Fabio Lobo*, 1:15-cr-00174-LGS (SDNY), ECF 211 at 5 (finding that, in connection with drug transactions with Leonel Rivera, Lobo “used members of his security detail to help escort the 1,000-kilogram load of cocaine in 2013.”)

The Cachiros further paid numerous members of the HNP, up to and including the Chief of the HNP, to provide sensitive law enforcement information to allow the Cachiros to avoid detection and pass through police checkpoints. Through bribing Fabio Lobo, the Cachiros also gained access to senior generals in the Honduran Army to provide military intelligence. 12/12/24 Hr’g Tr., ECF No. 45, at 96:2 – 97:22 (Rivera’s testimony that he bribed Pepe Lobo, then the President of Honduras, and his son Fabio Lobo for access to generals, military weapons, intelligence about military operations throughout the country, and vehicles with presidential license plates).

The Cachiros also controlled members of their own drug trafficking organization, rival drug trafficking organizations and anyone else who posed a threat to their interests through intimidation and violence. Indeed, as part of his cooperation agreement, Leonel Rivera has admitted to responsibility for 78 murders. *See, e.g.*, 12/12/24 Hr’g Tr., ECF No. 45, at 9:19 – 9:22.

Among the groups the Cachiros used to commit violence were members of MS-13, members of the HNP, and Leonel Rivera's extended family members, including his cousin Metro, his cousin Rubin Santos, and his father-in-law.

The Cachiros also laundered their drug trafficking proceeds through multiple front companies, including Palma del Bajo Aguan, S.A; Minera Mi Esperanza, S.A., Inversiones Turisticas Joya Grande, S.A. de C.V. and Ganaderos Agricultores del Norte, S. de R.L. de C.V. *See* Fatico Exhibit GX 108.

B. Mr. Martinez's Role in the Offense

Mr. Martinez, a member of the Liberal Party, acknowledges that he was one of the politicians who accepted money from the Riveras to fund his political campaigns. During his two terms in Congress, though, Mr. Martinez was never a member of the National Party, the political party in power. *See* 12/12/24 Hr'g Tr., ECF No. 45, 24 at 95:15 – 95:19 (Rivera's testimony that Martinez's party was never in power while Martinez served in Congress). As one of 128 Congressman and a member of the minority party, Mr. Martinez also never held a leadership position in Congress. *See, e.g.,* https://en.wikipedia.org/wiki/National_Congress_of_Honduras (showing the leadership of the Honduran Congress from 2010 to 2018 when Mr. Martinez was in Congress.) He also never had any authority over the enforcement of the Honduran drug laws.

Mr. Martinez was aware that the Riveras used his name as one of multiple owners of one of the multiple front companies used to launder money, *Ganaderos Agricultores del Norte, S. de R.L. de C.V.* PSR ¶ 37. Dating back at least as early as 2007, before he was a Congressman, and continuing through the time when Mr. Martinez was in Congress, Mr. Martinez was listed as owning a minority, 16.66%, interest in one of five front companies the Cachiros used to launder money, but he did not play any other role in facilitating the Cachiros's money laundering, and there is no evidence he benefitted from it. GX 402.

While PSR ¶ 33 notes that Mr. Martinez provided armed security for the Cachiors, and often wore his military uniform, Mr. Martinez's role in providing armed security to the Cachiros must be viewed in the context of the numerous other parties, including members of MS-13 and the HNP, who played similar roles in the Cachiros drug trafficking organization. Moreover, Mr. Martinez retired from the military in 1996 as a lieutenant and thus ceased having any active role in the military years before the offense conduct commenced. PSR ¶ 92. Additionally, Leonel Rivera acknowledged having far more powerful military connections than Mr. Martinez, with access to military weapons and military intelligence through Fabio Lobo. *See* 12/12/24 Hr'g Tr., ECF No. 45, 96:2 – 97:22.

With regard to the acts of violence at PSR ¶¶ 24-31, there is no question that such conduct is extremely serious. In the context of the charged Cachiros drug trafficking conspiracy, though, Leonel Rivera's testimony at the *Fatico* hearing made clear that Mr. Martinez was only one of numerous people Leonel Rivera called upon to participate in violence. *See, e.g.*, PSR ¶¶ 24-25 (describing Mr. Martinez as one of many people who provided information and joined efforts to try to kill Coqui, with Mr. Martinez playing no part in his later murder); 12/16/24 Hr'g Tr. at 125:19 – 126:7 (Rivera testifying that “[t]here were several groups” of sicarios at his disposal and that the attack on Ramos was carried out by “[s]ome hitmen” including Rivera's father-in-law.”); PSR ¶¶ 27-28 (noting that Rivera called upon hitmen to commit the murders); PSR ¶ 29 (noting that Mr. Martinez was “present” when others, Mr. Martinez's brother Ovando and Leonel Rivera, tortured and shot “Mantequilla.”); PSR ¶ 30 (noting that Mr. Martinez was one of multiple people, including Javier Rivera and “others” who shot an individual in a bar); PSR ¶ 31 (noting that Mr. Martinez, Leonel Rivera and “others” shot and killed Alex.)

C. Objections to the Presentence Report

For the record, Mr. Martinez maintains his objections to the acts of violence alleged at ¶¶ 24-31, but understands that this Court has found these facts by a preponderance of the evidence following a *Fatico* hearing.

With regard PSR ¶ 31, though, Mr. Martinez objects to including as relevant conduct the torture and murder of a person named “Alex.” Leonel Rivera testified at the *Fatico* hearing that “Alex” was tortured and killed because Alex arranged for Rivera’s cousin Carlos Maradiaga to be killed by a hitman because Carlos refused to sell Alex palm oil from his cooperative. 12/12/24 Hr’g Tr., ECF No. 45 at 40:1-20. Since the facts alleged in paragraph 31 have no relationship to the charged conspiracy to import drugs into the United States, they should not be considered relevant conduct.

D. The Guidelines Calculation

Mr. Martinez pled guilty, under Count 1 of the Indictment, to a lesser included offense of conspiring to import 500 grams or more of cocaine into the United States, in violation of 21 U.S.C. §§ 952(a), 960(a)(1), 960(a)(3), 960(b)(2)(B)(ii), and 963. At his plea hearing, Mr. Martinez acknowledged that he committed this offense by agreeing to assist others who were distributing cocaine destined for the United States.

The base offense level is 38 pursuant to U.S.S.G. § 2D1.1(a)(5) and (c)(1), because Mr. Martinez agreed that the drug weight attributable to the conspiracy was 450 kilograms or more of cocaine. Mr. Martinez further stipulated in his plea agreement to a 2-level enhancement under U.S.S.G. § 2D1.1(b)(1), because dangerous weapons were used in the conspiracy, and an additional 2-level enhancement under U.S.S.G. § 2D1.1(b)(3)(A) because the conspiracy involved the use of noncommercial aircraft to import a controlled substance. This Court further found by a preponderance of the evidence that a 2-level enhancement should be applied pursuant to U.S.S.G.

§ 2D1.1(b)(2) because the “defendant used violence, made a credible threat to use violence, or directed the use of violence.”

Mr. Martinez has zero criminal history points, and he in criminal history category I. With three points off for acceptance of responsibility, his total offense level is 41, and his Guidelines range is 324 to 405 months, with a mandatory minimum of 60 months’ imprisonment

IV. The 3553 Factors Warrant a 144 Month Sentence

As the Supreme Court made clear in *Koon v. United States*, a sentencing judge must “consider every convicted person as an individual and every case as a unique study in the human failings that sometimes mitigate, sometimes magnify, the crime and the punishment to ensue.” 518 U.S. 81, 113 (1996), *superseded by statute on other grounds as recognized in United States v. Kostakis*, 364 F.3d 45, 50-51 (2d Cir. 2004); *accord United States v. Re*, 682 F. App’x 33, 37 (2d Cir. 2017) (same). Therefore, while the Guidelines are the “starting point and the initial benchmark” for calculating a sentence, the Court “may not presume that the Guidelines range is reasonable.” *Gall v. United States*, 552 U.S. 38, 49-50 (2007); *accord United States v. Cavera*, 550 F.3d 180, 189 (2d Cir. 2008) (same). Rather, a sentencing court must make an “individualized assessment” of the sentence warranted by the factors set forth in 18 U.S.C. § 3553(a) “based on the facts presented.” *Gall*, 552 U.S. at 50; *accord United States v. Jones*, 531 F.3d 163, 170 (2d Cir. 2008) (same); U.S.S.G. Ch. 1 Pt. A (Proposed Amendments Apr. 11, 2025) (“The guidelines and policy statements set forth throughout the Guidelines Manual *represent the first step* in the sentencing process and are one of *multiple factors judges must consider* under 18 U.S.C. § 3553(a).”) (emphases added), *available at* https://www.ussc.gov/sites/default/files/pdf/amendment-process/reader-friendly-amendments/202504_prelim-rf.pdf#page=83.

Pursuant to 18 U.S.C. § 3553(a) and *United States v. Booker*, 543 U.S. 220 (2005), this Court must impose a sentence “sufficient, but not greater than necessary,” to achieve the objectives of sentencing, specifically with regard to the factors set forth at § 3553(a). Among the factors to be considered under § 3553(a) are (1) the nature and circumstances of the offense, (2) the history and characteristics of the defendant, and (3) the need for the sentence imposed—(A) to reflect the seriousness of the offense, to promote respect for the law, and to provide just punishment for the offense; (B) to afford adequate deterrence to criminal conduct; (C) to protect the public from future crimes of the defendant; and (D) to provide the defendant with needed educational or vocational training, medical care, or other correctional treatment in the most effective manner; and (4) the need to avoid unwarranted sentencing disparities. In Mr. Martinez’s case, the § 3553(a) factors warrant a substantial downward variance to a sentence of 144 months, which would be commensurate to that of similarly-situated defendants and would be sufficient but not greater than necessary to serve the goals of sentencing.

A. Mr. Martinez’s Role in the Offense Warrants the Requested Sentence

Mr. Martinez’s role in the Cachiros drug trafficking conspiracy warrants the requested 144-month sentence. Drug trafficking cocaine into the United States is undoubtedly a serious offense, particularly when considering the large quantity of drugs the Cachiros organization trafficked, which worked its way to the United States through Mexico. Mr. Martinez, though, was only one of numerous people the Cachiros enlisted to provide armed security to drug shipments.

Further, unlike the HNP, who were charged with enforcing the drug-trafficking laws in Honduras, Mr. Martinez did not have any authority over drug trafficking. As a member of Congress in the minority party, Mr. Martinez also had far less power than the numerous other politicians Mr. Rivera bribed, up to including Honduran presidents. As a retired member of the

military with the rank of lieutenant, Mr. Martinez also had far less access to military information than the generals to which Fabio Lobo provided Leonel Rivera access. Mr. Martinez's sentence should therefore reflect his limited role in the drug trafficking organization.

In light of Mr. Martinez's role in the offense, the drug weight of 450 kg of cocaine, which is the primary driver of Mr. Martinez's high Guidelines range and base offense level, overstates the seriousness of his offense.

Mr. Martinez's role in the drug trafficking aspects of the offense was as a subordinate to the Cachiros, as, even according to Leonel Rivera, Mr. Martinez was only one member of many groups, which provided heavily-armed security for the Cachiros. There is no indication that Mr. Martinez had any ownership of the drugs involved, or that he had any independent relationships with other drug traffickers or sources or supply.

With regard to the 2-level enhancement for use of an aircraft, while private aircraft were used as part of the conspiracy to which Mr. Martinez pled and he agrees that the enhancement applies, Mr. Martinez himself played no role in transporting drugs on airplanes. He was not a pilot, he did not transport drugs on planes himself, he did not construct or own airstrips, and he played no role in organizing the use of private commercial aircraft to transport drugs. As applied to Mr. Martinez's role in the offense, then, the Guidelines range based heavily on drug weight and the aircraft enhancement overstates the seriousness of his offense.

This Court has also found, by a preponderance of the evidence, that Mr. Martinez engaged in serious acts of violence with the Cachiros, and this enhancement increases Mr. Martinez's Guidelines range by more than 5 years, from a base offense level of 39 and a Guidelines range of 262-327 months to a Guidelines range of 324-405 months. In determining the weight to accord to the allegations of violence at PSR ¶¶ 24-31, though, the defense respectfully urges the Court to

factor into its sentence that these facts were only established by a preponderance of the evidence. The Second Circuit has repeatedly held that “the factual finding by a preponderance . . . is a preliminary step susceptible to adjustment.” *United States v. Cordoba-Murgas*, 233 F.3d 704, 709 (2d Cir. 2000) (emphasis added). Where, as here, a particular enhancement significantly increases a defendant’s Guidelines range based on uncharged conduct not proven at trial and found by only a preponderance, “this extraordinary combination of circumstances” may justify a downward adjustment. *Id.*

The Second Circuit has explained:

In our view, the preponderance standard is no more than a threshold basis for adjustments and departures, and the weight of the evidence, at some point along a continuum of sentence severity, should be considered with regard to both upward adjustments and upward departures. With regard to upward adjustments, a sentencing judge should require that the weight of the factual record justify a sentence within the adjusted Guidelines range. In doing so, the Court may examine whether the conduct underlying multiple upward adjustments was proven by a standard greater than that of preponderance, such as clear and convincing or even beyond reasonable doubt where appropriate. Where a higher standard, appropriate to a substantially enhanced sentence range, is not met, the court should depart downwardly.

United States v. Gigante, 94 F.3d 53, 56 (2d Cir. 1996). *See also United States v. Norris*, 281 F.3d 357, 361-62 (2d Cir. 2002) (same).

When weighing the conduct at PSR ¶¶ 24-31 the defense respectfully urges the Court to vary downward under 18 U.S.C. § 3553(a) as the conduct was not charged, it was not proven beyond a reasonable doubt, the conduct occurred thousands of miles away in Honduras more than a decade ago, no forensic evidence was produced with regard to the conduct, and the preponderance standard was met with incentivized cooperator testimony, which has often been shown to be unreliable. *See, e.g., State v. Patterson*, 276 Conn. 452, 468, 886 A.2d 777, 789 (2005) (“we have observed that the inherent unreliability of accomplice testimony ordinarily

requires a particular caution to the jury [because] ... [t]he conditions of character and interest most inconsistent with a credible witness, very frequently, but not always, attend an accomplice when he testifies.”) (citations omitted); *Commonwealth of N. Mariana Islands v. Bowie*, 243 F.3d 1109, 1123-24 (9th Cir. 2001) (“a criminal charged with a serious crime understands that a fast and easy way out of trouble with the law is ... to cut a deal at someone else’s expense and to purchase leniency from the government by offering testimony ... in return for reduced incarceration.”)

B. The Need to Avoid Unwarranted Sentencing Disparities

In sentencing Mr. Martinez, the defense also urges the Court to take into account the need to avoid unwarranted sentencing disparities with similarly-situated defendants who have been sentenced for similar conduct. Numerous high-ranking members of the Honduran government and police department have been extradited to the United States and sentenced for their conduct in connection with drug trafficking. As reflected in the chart attached as Exhibit A, which contains details for the sentences of defendants most relevant to Mr. Martinez, multiple defendants with comparable conduct, several of which engaged in violence akin to, or worse than, that the Court found Mr. Martinez engaged in, received substantially below-Guidelines sentences.

For instance, Ludwig Criss Zelaya Romero, a former HNP officer who received a three-point leadership enhancement for recruiting other officers, took bribes from the Riveras to protect “tons and tons” of cocaine as it moved through Honduras. *United States v. Zelaya Romero*, No. 15-cr-174 (LGS), ECF No. 512, at 4-5; ECF No. 525 at 16. Zelaya Romero also attempted multiple murders on behalf of the Riveras and “personally assisted in murders that resulted in at least six deaths.” *Id.* at 6-7, 11. Zelaya Romero was sentenced to 144 months’ imprisonment, significantly below his Guidelines range of 235 to 293 months, and Mr. Martinez should be similarly sentenced. *See id.*, ECF No. 519.

Other members of the HNP have similarly received substantially below-Guidelines sentences, despite allegations that they were high-level participants in the Cachiros drug trafficking organization and were responsible for trafficking hundreds of kilograms of cocaine. *See, e.g.*, Ex. A; *United States v. Avila Meza*, No. 15-cr-174 (LGS), ECF 510 (sentencing Avila Meza to 144 months' imprisonment); *United States v. Zavala Velasquez*, No. 15-cr-174 (LGS), ECF 329, at 1; ECF No. 333 (sentencing Zavala Velasquez to 144 months' imprisonment); *United States v. Lopez Flores*, No. 15-cr-174 (LGS), ECF No. 293, at 1; ECF No. 299 (sentencing Lopez Flores to 60 months' imprisonment).

Yet another former HNP officer, Carlos Alberto Valladares Garcia,¹ had a “criminal relationship” with the Riveras that lasted approximately a decade and involved both drug trafficking and murder. *See United States v. Valladares Garcia*, No. 15-cr-174 (LGS), ECF No. 348, at 3. According to the Government, in addition to assisting in the Riveras' cocaine-trafficking activities, Valladares Garcia was present with Leonel Rivera at a preplanned “mass casualty attack on rival drug traffickers” that killed six people; he identified and helped capture two individuals who were later tortured and murdered; and he participated in the same nightclub shootout at which Mr. Martinez was found to have participated. *Id.* at 3-4. The Court sentenced Valladares Garcia to 168 months' imprisonment, the bottom of his Guidelines range. *See id.*, ECF No. 355. Since, unlike Valladares Garcia, Mr. Martinez was not a police officer charged with enforcing Honduran drug laws, Mr. Martinez should be sentenced less.

Juan Carlos Bonilla Valladares, who was the former Chief of the HNP, “the top law enforcement officer in his country,” caused the HNP to provide protection for hundreds of kilograms of cocaine passing through Honduras between 2003 and 2016, as well as for major drug

¹ This defendant is referred to as Carlos Alberto Valladares Zuniga in some court records.

traffickers such as Tony Hernandez (brother of the then-President of Honduras), Alex Ardon (then-mayor of El Paraiso), the Valle brothers, who ran a major Honduran cartel, and Mexican drug traffickers. *United States v. Bonilla Valladares*, No. 15-cr-379 (PKC), ECF No. 817, at 2-3; ECF No. 846 at 21-222. *See also* ECF No. 846 at 24 (“the defendant was at the top of the food chain in the National Police.”) Bonilla Valladares also used HNP resources to target and murder one of Tony Hernandez’s drug-trafficking rivals, and he provided police protection for MS-13’s drug-trafficking activities. *See* ECF No. 817 at 5-7. Bonilla Valladares was sentenced in August 2024 to 228 months’ imprisonment—a significant downward variance from his Guidelines range of life imprisonment, and well below the Government’s requested 30-year sentence. *See id.*, ECF No. 821. Mr. Martinez, who had no comparable position of power or duty to enforce drug laws, should receive a sentence substantially below that of Bonilla Valladares.

In light of the sentences of other similarly situated defendants, the defense respectfully urges the Court to sentence Mr. Martinez to a substantially-below Guidelines sentence of 144 months.

C. Mr. Martinez’s History and Characteristics Warrant the Requested Sentence.

A substantial downward variance is further warranted in light of multiple mitigating factors in Mr. Martinez’s background. Mr. Martinez was raised in poverty, and beginning at age 7, he spent long days, from the crack of dawn until the evening, working the fields as a farmer and running a small family business in rural Honduras. Unlike many Honduran defendants who have been sentenced in United States courts, who lived in luxury and accumulated substantial assets from their drug trafficking activity, Mr. Martinez lived modestly, worked hard in the fields, even when he was a Congressman, and he has minimal assets.

While Mr. Martinez deeply regrets that he allowed his values to be compromised when he associated with the Riveras, letters from Mr. Martinez's constituents, who are grateful for his service, show that that he took his role as a Congressman in Honduras seriously, and he used his position to make a substantial real-world impact on the lives of many in his community, including providing lighting to improve safety, and helping build churches, schools, and sports fields for children. He also helped members of his community find the housing, jobs, medicine and transportation they desperately needed. *See* Ex. B.

Letters from Mr. Martinez's family also show that he is a beloved, devoted father, who dedicated himself to loving and supporting his children, and fostering their dreams. The fact that two of Mr. Martinez's daughters are working their way through medical school is a testament to the many hours he devoted to nurturing their education. Mr. Martinez's family also attests to the love and support he has provided to his infirm mother, his wife and her family, and his siblings. *See* Ex. C. These characteristics warrant leniency.

D. Mr. Martinez's Age and Medical Conditions Warrant Leniency

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED], as Mr. Martinez ages, he will undoubtedly have increasing medical needs that will be costly for the BOP to treat, at taxpayer expense, and which the BOP has proven to be ill-equipped to adequately address. *See* U.S. Dep't of Justice, Office of the Inspector General, *The Impact of an Aging Inmate Population on the Federal Bureau of Prisons* at 10 ("Aging inmates are more costly to incarcerate, primarily due to their medical needs."); *id.* ("We found that an aging inmate, on average, costs 8 percent more to

incarcerate than a younger inmate.”); *id.* at 15 (“Aging inmates disproportionately require catastrophic medical care.”); *id.* at 16-17 (“BOP institutions lack appropriate staffing levels to address the needs of an aging inmate population and provide limited training for this purpose. . . . the increasing population of aging inmates has resulted in a need for increased trips outside of institutions to address their medical needs but . . . institutions lack Correctional Officers to staff these trips and have limited medical staff within institutions. As a result, aging inmates experience delays receiving medical care.”); *id.* at 23 (“The physical infrastructure of BOP institutions cannot adequately house aging inmates. . . . However, the BOP’s ability to confine its aging inmate population is insufficient due to overcrowding in its institutions, as well as problems with their internal and external infrastructures[, including l]ower bunks, essential for accommodating aging inmates with mobility limitations or medical conditions, . . . as well as handicapped-accessible cells and bathrooms”); *id.* at 28 (“[T]he BOP has not conducted [a] BOP-wide review of the accessibility of all institutions since 1996.”). A lengthy term of incarceration, such as the 360 months sought by Probation, therefore runs counter the sentencing goal of providing needed medical care in the most effect manner.

E. The Harsh Conditions of Mr. Martinez’s Confinement To Date Warrant Leniency

Since his extradition in March 2023, Mr. Martinez has endured exceptionally harsh conditions of confinement at the Metropolitan Detention Center (“MDC”) in Brooklyn, including regular exposure to violence, repeated lockdowns and contaminated food. *See United States v. Colucci*, 743 F. Supp. 3d 452, 453 (E.D.N.Y. 2024) (noting “an extrinsic factor that looms large in nearly every bail and sentencing determination made in this judicial district: the dangerous, barbaric conditions that have existed for some time at the Metropolitan Detention Center (‘MDC’) in Brooklyn” and observing that, “[w]hile these conditions—[including] prisoners locked down in

housing units without any guards present combined with inoperable panic buttons—may seem unimaginable, it is well established that such deficits have . . . long persisted at the MDC”) (footnote omitted); *United States v. Nunez*, No. 23 Cr. 517 (AT), 2024 WL 4504493, at *6 (S.D.N.Y. Oct. 16, 2024) (“citing “the uniquely harsh conditions” at the MDC, “which included perpetual lockdowns, inadequate medical care, and staggering violence that made time spent there essentially the equivalent of either time and a half or two times what would ordinarily be served,” and noting “reports of maggots or weevils found in the food being served to inmates” and the fact that “[m]ultiple MDC inmates were murdered at the facility in the summer of 2024”) (quotation marks omitted); *United States v. Santana*, No. 22 Cr. 368 (VM), 2024 WL 2275037, at *2 (S.D.N.Y. May 20, 2024) (“Given the severe prison conditions that prevail at the MDC (conditions that amount to imposing harsher punishments on prisoners), this Court and others have adjusted sentences of defendants in custody there for lengthy periods.”); *United States v. Griffin*, No. 22-CR-408 (EK), 2024 WL 2891686, at *3 (E.D.N.Y. June 10, 2024 (“[I]t has been well documented that the MDC has an ongoing issue with frequent lockdowns due to violence and the threat of violence, among other concerns, which has delayed medical care for a number of inmates.”). The harsh conditions of Mr. Martinez’s confinement to date warrant leniency.

F. A Substantially Below Guidelines Sentence Would Be Sufficient for Deterrence and Punishment

By any measure, the requested 144 month sentence is a substantial punishment for a first-time offender who has never before set foot in a prison cell. For Mr. Martinez, his confinement has been particularly challenging because his tight-knit family has no financial resources to come to visit him. A 144-month sentence with no ability to see his family would thus undoubtedly be a severe punishment for Mr. Martinez, and it would impress upon him the seriousness of his offense. Indeed, the requested sentence effectively assures that he will never see his elderly mother, who

suffers from a number of serious health issues, again. This in and of itself is a punishment to Mr. Martinez, who is deeply devoted to his mother. Mr. Martinez himself will also be well into his 70s when he is released, making it exceedingly unlikely that he would reoffend.

The prosecution of Mr. Martinez and numerous prominent politicians and law enforcement officers have also been widely reported in Honduras, ensuring that the substantial 144-month sentence Mr. Martinez seeks will have a deterrent effect on others in Honduras and other countries, who might consider aiding in trafficking drugs into the United States.

V. Conclusion

For the foregoing reasons, the defense submits that a sentence of 144 months, which is commensurate with sentences imposed upon similarly situated defendants who played a comparable role to Mr. Martinez, would be sufficient but not greater than necessary to serve the goals of sentencing.

Respectfully Submitted,

Dated: August 5, 2025

GELBER & SANTILLO PLLC

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Midence Oqueli Martinez Turcios

EXHIBIT A

Defendant	Docket No.	Role	Sentence
Victor Oswaldo Lopez Flores	15-cr-174 (LGS)	Honduran National Police (“HNP”) officer, whose duty was to target drug traffickers. ECF 307 at 9. Attended two meetings, during which Flores and other members of the HNP showed informants posing as drug traffickers maps and detailed how to best transport drugs and evade checkpoints, he agreed to escort drugs carrying weapons, and agreed to accept a \$100,000 bribe in exchange. ECF 293 at 4.	60 months (Guideline 168-210 months)
Ludwig Criss Zelaya Romero	15-cr-174 (LGS)	Former HNP officer Took bribes from Riveras to protect “tons and tons” of cocaine. ECF 512, at 4-5 3-point leadership enhancement for recruiting police officers. ECF 525 at 16. Participated in multiple murders and attempted murders including: shooting and killing someone at Leonel Rivera’s behest; participating in a stakeout at airport in San Pedro Sula, resulting in six dead; organizing botched murder of a reporter—resulting in the death of innocent victim; assembling teams of hitmen to attempt to murder a rival drug trafficker and a lawyer who refused to return a retainer fee. ECF 512 at 6-7, 11, 16-17. Protected massive cocaine loads as they traveled across Honduras en route to the United States. ECF 512 at 3. Provided access to information about police checkpoints. ECF 512 at 5.	144 months (Guideline 235-293 months) (Concurrent 144 month sentence for firearm possession.)

Juan Manuel Avila Meza	15-cr-174 (LGS)	<p>Police officer and attorney. ECF 490 at 1.</p> <p>Provided Riveras with sensitive law enforcement information to facilitate transportation of cocaine, and gave the Cachiros large quantities of cocaine seized from other drug traffickers by the police. 490 at 5-6.</p> <p>While a member of the police, did legal work to help the Riveras evade OFAC sanctions and launder money, recruited other lawyers to do the same, and arranged meeting with President of Honduras's brother to facilitate given government contracts to Riveras. ECF 490 at 6-8.</p> <p>On video, identified police checkpoints and displayed sensitive law enforcement information to undercover agents posing as members of the Sinaloa cartel to help them evade police, solicited bribes from the agents, and directed the group, including fellow police officers, to destroy evidence. ECF 490 at 13-16.</p> <p>Enforced debts owed to the Cachiros through threats of violence. ECF 490 at 21-22.</p>	144 months (Guideline 210-262 months)
Otto Rene Salguero Morales	15-cr-379 (PKC)	Facilitated the importation of thousands of kilograms of cocaine destined for the United States. ECF 589 at 35.ECF 573 at 1.	144 months each (Guidelines 210 to 262 months)
Ronald Enrique Salguero Portillo		Controlled ranches, or "fincas," located on the Honduras-Guatemala border, through which drugs were trafficked to U.S. ECF 573 at 2.	(Concurrent 144 month sentence for firearm possession)
		Stored tons of cocaine on their properties to be picked up by Mexican cartels. ECF 589 at 31.	
		Provided security for cocaine loads with an array of heavy weaponry, including machineguns and a bazooka. ECF 573 at 2.	

Carlos Alberto Valladares Zuniga a/ka Garcia	15-cr-174 (LGS)	<p>Lawyer and high-ranking member of the Honduran National Police, including police chief of various departments in Honduras. ECF 348 at 3, 9.</p> <p>As chief of homicide unit, shut down murder investigation into Leonel Rivera. ECF at 8.</p> <p>Present with Leonel Rivera at a preplanned “mass casualty attack on rival drug traffickers” that killed six people. ECF 348 at 4.</p> <p>Identified and helped capture two individuals who were later tortured and murdered. ECF 348 at 5.</p> <p>Participated in the same nightclub shootout in which Mr. Martinez was alleged to have participated. <i>Id.</i> at 3-4.</p> <p>Recruited six members of the Honduran National Police to participate in a drug deal with President Pepe Lobo’s son Fabio Lobo and purported members of the Sinaloa Cartel. ECF 348 at 4.</p> <p>Escorted shipments of cocaine and gave Riveras information about checkpoints. ECF 348 at 4.</p> <p>Carried firearms and was present with security teams that were armed with assault rifles. ECF 348 at 7.</p> <p>Recovered \$2,000,000 USD in seized drug-trafficking and returned it to the Cachiros. ECF 348 at 9.</p>	<p>168 months</p> <p>(Guideline 168 to 210 months)</p> <p>(Concurrent 168 month sentence for firearm possession)</p>
Mauricio Hernandez Pineda	15-cr-379 (PKC)	<p>Leveraged his “proximity to power” as a cousin of Juan Orlando and Tony Hernandez to facilitate drug trafficking. ECF 803 at 9.</p> <p>Attended meetings with El Chapo and President Juan Orlando Hernandez’s brother, Tony Hernandez, armed with a bazooka, at which</p>	<p>180 months</p> <p>(Guideline-life imprisonment)</p>

		<p>a \$1 million bribe was paid to fund Juan Orlando Hernandez's presidential campaign. ECF 803 at 9.</p> <p>Received bribes in exchange for providing armed security for drug loads. ECF 803 at 3.</p> <p>Enlisted HNP officers armed with firearms, including machineguns, to protect narcotics shipments, and was personally armed with assault rifles and handguns. ECF 803 at 3.</p> <p>Personally escorted shipments across Honduras to locations near the border of Guatemala in a caravan of vehicles. ECF 803 at 3.</p> <p>Used position and contacts within the HNP to ensure that caravans escorting cocaine would not be stopped at checkpoints. ECF 803 at 3.</p> <p>Tried to dissuade co-conspirators with information about Pineda, Juan Orlando, and Tony Hernandez from cooperating with U.S. authorities. ECF 803 at 10.</p> <p>Enhancements included: use of a dangerous weapon; using an aircraft; bribing law enforcement officials; pattern of criminal conduct engaged in as livelihood; three-level increase for being a manager or supervisor; abuse of a position of public trust.</p>	
<p>Juan Carlos Bonilla Valladares (“El Tigre”)</p>	<p>15-cr-379 (PKC)</p>	<p>Former Chief of the HNP, “the highest position in law enforcement in his country.” ECF 846 at 22.</p> <p>Protected hundreds of kilograms of cocaine passing from 2003 and 2016</p> <p>Worked with multiple drug-trafficking organizations (Tony Hernandez, Alex Ardon, the Valle Brothers, and Mexican drug traffickers) in exchange for bribes. ECF 846 at 22; ECF 817 at 3.</p>	<p>228 months</p> <p>(Guideline-life imprisonment)</p>

		<p>Targeted and murdered one of Tony Hernandez's drug-trafficking rivals. ECF 846 at 23.</p> <p>Provide armed protection for cocaine shipments. ECF 817 at 3.</p> <p>Provided police protection for MS-13's drug-trafficking activities, including protecting shipments of cocaine and compensating MS-13 with a "truck full of weapons" when a shipment was lost. ECF 817 at 6-7.</p> <p>Furnished sensitive information regarding the activities of law enforcement, including information obtained through aerial photographs to co-conspirators in order to facilitate their drug trafficking. ECF 846 at 26.</p>	
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EXHIBIT B

La Bolsa, Tocoa, Colón, Honduras

20 de marzo 2025

Honorable Lewis A. Kaplan
United States Courthouse
Southern District of New York
500 pearl St.
New York, NY 10007-1312

United States v. Martínez Turcios, 1:18-cr-00499 (LaK)


Respetable Juez Kaplan, le deseo éxitos, le escribo la presente carta en calidad de presidente del patronato de nuestra comunidad La Bolsa de la ciudad de Tocoa departamento de Colón,

El infrascrito presidente del patronato de la comunidad de La Bolsa, Tocoa Colón, Honduras. certifica que el señor Midence Oquely Martínez Turcios ha sido una persona muy servicial, desde antes de ser diputado el daba ayudas económicas apoyando a diferentes personas de escasos recursos de nuestra comunidad y cuando fue diputado nos ayudó en la reparación de la calle de nuestra comunidad y Colonia, también nos ayudó cuando personas de escasos recursos necesitaban un ataúd cuando había fallecido algún Familiar, o alimentación para el velorio, nos ayudó en reparaciones de la escuela y del kínder, también nos ayudó con material para construir la entrada de concreto de la calle, fue una persona que también ayudaba en situaciones personales. Recuerdo cuando dio todo el material eléctrico para una vivienda que había sufrido un incendio a una familia que había quedado sin nada, recuerdo también en otra vez cuando ayudó a personas que necesitaban una operación, que necesitaban una ambulancia, después de Dios, él fue el respaldo que tuvo nuestra comunidad. Cada vez que había alguien con necesidad yo le buscaba y él siempre contestaba el teléfono, si él estaba en Tegucigalpa en el congreso nacional, él me contestaba y me decía: Don Jorge el fin de semana estaré en Tocoa, llegué a mi casa y así lo hacía yo y ahí estaba él para atenderme y ayudarme a

resolver las necesidades de la gente de la comunidad, él fue quien nos ayudó con víveres, alimentación y muchas cosas más en tiempo de inundaciones, él ha sido un gran líder en todo el sector Zamora que pertenece a Tocoa Colón. Por eso aquí lo queremos y lo respetamos mucho porque lo conocimos como una persona de buenos sentimientos, de buenos principios, y siempre de buen actuar. Nos duele la situación por la que él está pasando, nos solidarizamos con él y su familia y que él sepa que aquí tiene verdaderos amigos agradecidos que creemos en él y lo esperamos, le pedimos Señor juez tenga piedad y sea dócil en la sentencia a este hombre que es de bien para nuestras comunidades y para su familia, y nos permita volver a compartir con él, antes de que algunos nos vayamos de este mundo, nos dolió mucho no poder despedirnos de él y aquí la mayoría somos de escasos recursos no podemos ir a verlo allá. Para los fines que el interesado convenga le extiendo la presente a los 20 días del mes de marzo del año 2025

Dios lo bendiga

Atentamente:



The image shows a handwritten signature in black ink over a circular stamp. The stamp contains the text "PATRONATO PRO-MEJORAMIENTO" at the top, "FUERZAS UNIDAS" in the center, and "COMUNIDAD LA BOLSA" at the bottom. The signature is written over a horizontal line.

Jorge Alberto Morales
Presidente Patronato, La bolsa, Tocoa Colón
Cel. [REDACTED]

La Bolsa, Tocoa, Colón, Honduras

March 20, 2025

Honorable Lewis A. Kaplan
United States Courthouse
Southern District of New York
500 Pearl St.
New York, NY 10007-1312

United States v. Martínez Turcios, 1:18-cr-00499 (LAK)

Honorable Judge Kaplan,

I wish you success. I write this letter in my capacity as president of the board of our community La Bolsa in the city of Tocoa, Colón Sector.

The undersigned president of the board of the community of La Bolsa, Tocoa Colón, Honduras, certifies that Mr. Midence Oquely Martínez Turcios has been a very helpful person. Even before he was a congressman, he provided financial assistance, supporting different low-income individuals in our community and when he was a congressman, he helped us repair the street in our community and Colonia. He also helped us when low-income individuals needed a coffin when a family member had passed away, or food for the wake. He helped us with repairs to the school and the kindergarten. He also helped us with materials to build the concrete entrance to the street. He was a person who also helped in personal situations.

I remember when he provided all the electrical materials for a house that had suffered a fire to a family that had lost everything. I also remember another time when he helped people who needed surgery, who needed an ambulance. After God, he was the support of our community. Every time there was someone in need, I would look for him. He always answered the phone; if he was in Tegucigalpa at the national congress, he would answer and tell me: "Mr. Jorge I will be in Tocoa this weekend, come to my house and I would do so," and there he was to assist me and help me resolve the needs of the people in the community. He was the one who helped us with provisions, food and many more things during times of flooding. He has been a great leader in the entire Zamora sector that belongs to Tocoa Colón. That is why we love and respect him very much, because we knew him as a person of good feelings, good principles, and always good actions. We are saddened by the situation he is going through. We stand in solidarity with him and his family, and may he know that here he has true grateful friends who believe in him, and we await him. We ask you, Your Honor, to have mercy and be lenient in the sentencing of this man, who is a good person for our communities and for his family, and allow us to enjoy association with him again, before some of us leave this world. It hurt us a lot not to be able to say goodbye to him and here most of us are from limited resources, so we cannot go see him there. For the purposes that the interested party agrees, I extend this on the 20th day of the month of March of the year 2025.

God bless you.

Sincerely,

Jorge Alberto Morales
President of the Board, La Bolsa, Tocoa Colón
Cell. [REDACTED]

Balfate, colon, Honduras c.a

24 de septiembre del 2024

De parte: Denis Javier Hernández Vásquez

Honorable: Lewis A. Kaplan

United State courthouse

Southern District of New york

New york,NY 10007 -1312

United State V. Martínez Turcios 1:18-cr-00499(LAK)

Estimado Juez Kaplan, lo saludo muy respetuosamente. Yo Denis Javier Hernández Vásquez, Hondureño y en esta ocasión quiero dar a conocer mi humilde opinión sobre Martínez Turcios, yo lo conocí en la política el año 2010 y observe en el una persona carismática, humilde, servicial que nos ayudó en lo poco que él pudo, con puestos de trabajo, canastas alimenticias familiares, ayudo mucho a los campesinos y pescadores artesanales ya que en nuestro país hay mucha pobreza y este hombre por eso es muy querido y recordado en el departamento de colon porque se dio a querer por la gente más pobre por su valiosa bondad por los más necesitados.

Martínez Turcios es un hombre leal, sincero, con mucha fe en dios, respetuoso.

Como Amigo fue muy bondadoso ya que siempre que le solicitamos ayuda para Escuelas,ancianos,enfermos,hambrientos,iglesias siempre nos colaboró. Y lo que más nos enseñó es que siempre debemos orar a dios para cualquier propósito en nuestras vidas para sentirnos seguros y gozosos.

En nuestra comunidad Martinez Turcios nos donó pinturas para pintar canoas para pescadores artesanales, en nuestra comunidad ayudo a muchos ancianos proveyendo comida, ya que no tenían quien por ellos.

En la escuela ayudaba mucho para el día del niño con piñatas, dulces, pasteles.

Ayudaba a la gente más humilde en puestos de trabajo.

Martínez Turcios siempre venía a nuestras comunidades solo, nunca le vimos cosas indebidas siempre fue muy sociable con todas las personas.

Siento que han dañado su personalidad a él y a toda su familia porque emocionalmente se siente como lo peor de la sociedad, él es un ser humano muy bueno.

Yo me solidarizo con mi amigo Martinez Turcios y seguiré creyendo y confiando en él por fue un líder en nuestro departamento de colon.

Muy conocido y respetado por su forma de ser y de actuar.



Atte. Denis Javier Hernández Vásquez

HONORABLE LEWIS A. KAPLAN
UNITED STATES COURTHOUSE
Southern District of New York
500 Pearl St.
New York, NY 10007-1312

Regarding: United States v. Martínez Turcios, 1:18-cr-00499 (LAK)

Dear Judge Kaplan,

I greet you very respectfully.

I, Dennis Javier Hernández Vázquez, am a Honduran citizen. I would like to express my humble opinion about Mr. Martínez Turcios. I met him in politics in the year 2010, and I observed in him a very humble, charismatic person and helpful, who assisted us in the little he could, donated basic food baskets for feeding families, and helped many farmers and fishermen. There is a lot of poverty in our country, and this man is very loved and remembered in the sector of Colón, because he endeared himself to the poorest people for his valuable kindness to the most needy. Martínez Turcios is a loyal, sincere, and very respectful man. As a friend, he was very kind, as he always helped us when we requested assistance for school, for the elderly, for the sick, for the hungry, and for churches. He always collaborated, and what he taught us the most is that we should always pray to God for any purpose in our lives. Martínez Turcios donated paint to us to paint canoes for artisanal fishermen, and in our community, he helped many elderly people by providing food and medicine, since they had no one to help them. In school, he helped a lot for Children's Day with piñatas, sweets, cakes, and he helped the humblest people by finding them sources of work. Martínez Turcios always came to our community alone or with his wife; we never saw him involved in improper things. He was always a sociable man with everyone. I feel that they have damaged his personality and that of his whole family. Because he feels bad emotionally, he is a very good man, I stand in solidarity with my friend Martínez Turcios, and I will continue to believe and trust in him because he was a well-known, beloved, and respected leader in our sector. For his way of being and acting, I ask you to take these words into account.

Thank you.

Sincerely,

Denis Javier Hernández Vázquez
From the municipality of Balfate, sector of Colón, Honduras

Tocoa, Colón, Honduras. Abril 2025

HONORABLE LEWIS A. KAPLAN
UNITED STATES COURTHOUSE
Southern District of New York
500 Pearl St.

New York, NY 10007-1312

Referente a: United States v. Martinez Turcios, 1:18-cr-00499 (LAK)

Estimado Juez, Reciba muchas bendiciones de nuestro padre celestial, le saluda el Pastor Samuel Fajardo, líder de la congregación Iglesia de Dios, Casa de salvación, de la ciudad de Tocoa Colón, le doy gracias a Dios por permitirme escribir estas líneas para poder dar a conocer a su persona mi sentir y el concepto que tengo del señor Midence Martínez, conocí a Midence hace muchos años, aproximadamente hace 15 años, una noche yo venía con unos hermanos de la iglesia de la ciudad de La Ceiba hacia Tocoa, cuando a la altura de Jutiapa atlántida, nuestro carro se punchó de una llanta y estábamos ahí parados en medio de la noche, cuando de repente un carro se estacionó unos 5 metros adelante y se bajó un hombre y venía hacia nosotros y era Midence, sin conocernos nos ayudó a cambiar la llanta del carro y luego vino detrás de nosotros asegurándose que llegáramos sanos y salvos a Tocoa y feliz que ya estábamos en Tocoa y pues esa acción dice más que mil palabras, de un hombre servicial, qué busca hacer el bien sin recibir nada a cambio, sin conocer a las personas y la humildad de servir él con sus propias manos, desde ese entonces entablamos una bonita amistad y en varias ocasiones que pedimos su colaboración económica para nuestra iglesia, él siempre estuvo ahí para apoyar la obra de Dios, en una ocasión nos colaboró con el techo de la iglesia y así siempre él fue una mano amiga para todos los miembros de la iglesia, recuerdo otra vez que estábamos en la casa de uno de los hermanos de la iglesia, donde David Ramos y estábamos en plena prédica y adoración cuando entró Midence, no era algo planeado él no iba por ser parte de ese evento, pero se sentó y escuchó atentamente todo el mensaje, al finalizar le tome sus manos y oramos por él y él conmovido se le rodaron sus lágrimas, siempre mostró ser un hombre muy respetuoso, educado, servicial, temeroso de Dios, un buen amigo, compartimos tiempos espirituales muy fuertes. Para la congregación fue una persona muy cercana, noble, amable, respetable, alegre Por cierto, un hombre muy colaborador, para los hombres Midence es exactamente eso, para nosotros como congregación pues alguien que estuvo presente ahí para adorar al señor. Dios en su palabra nos pide ser misericordiosos, como él es misericordioso con nosotros y perdonar a los demás, como él nos perdona todos los días nuestras faltas, En el nombre de Jesús señor juez apelo a la bondad, a la compasión de su corazón y le pido su misericordia para que Midence pueda regresar con su esposa, sus hijos, su madre y su familia y todos los amigos que aquí hemos sentido mucho lo que le ha pasado. Dios siempre nos da otra oportunidad y Midence al salir libre se que sera un hombre aún mejor de lo que era y será un instrumento de Dios en esta tierra. Me despido de usted pidiendo el favor de Dios que tome en cuenta estas líneas.

Atentamente
 Pastor Samuel Fajardo Celular: [REDACTED]



Tocoa, Colón, Honduras

April 2025

**HONORABLE LEWIS A. KAPLAN
UNITED STATES COURTHOUSE
Southern District of New York
500 Pearl St.
New York, NY 10007-1312**

Regarding: United States v. Martínez Turcios, 1:18-cr-00499 (LAK)

Dear Judge,

May you receive many blessings from our heavenly father. Greetings from Pastor Samuel Fajardo, leader of the Church of God congregation, House of Salvation, from the city of Tocoa, Colón. I thank God for allowing me to write these lines to express my feelings and the impressions I have of Mr. Midence Martínez. I met Midence many years ago, approximately 15 years ago. One night, I was coming with some brothers from the church in the city of La Ceiba towards Tocoa when, at the height of Jutiapa Atlantida, our car got a flat tire and we were standing there in the middle of the night. Suddenly, a car parked about 5 meters ahead, and a man got out and came towards us; it was Midence. Without knowing us, he helped us change the tire of the car. Then he came behind us, ensuring that we arrived safe and sound in Tocoa, and happy that we were already in Tocoa. That action speaks more than a thousand words, of a helpful man who seeks to do good without receiving anything in return, without knowing people, and the humility of serving with his own hands. Since then, we established a beautiful friendship, and on several occasions when we asked for his financial assistance for our church, he was always there to support the work of God. On one occasion, he assisted us with the church's roof, and he was always a helpful hand to all the church members. I remember another time we were at the house of one of the brothers of the church, where David Ramos and I were in full preaching and worship when Midence entered. It was not planned; he was not to be part of that event, but he sat down and listened attentively to the whole message. At the end, I took his hands and we prayed for him, and he was moved to shed tears. He always showed himself to be a very respectful, polite man, helpful, God-fearing, and a good friend. We shared very strong spiritual ties. For the congregation, he was a very close, noble, kind person, respectable, cheerful, and also a very helpful man. For the men, Midence is exactly that. For us as a congregation, he was someone who was present there to worship the Lord. God in his word asks us to be merciful, as he is merciful to us, and to forgive others, as he forgives us our faults every day. In the name of Jesus, Your Honor, I appeal to the goodness, to the compassion of your heart, and I ask for your mercy so that Midence can return to his wife, his children, his mother, and his family and all the friends who here have felt sorry for what has happened to him. God always gives us another chance. When he is released, I know he will be a man even better than he was and will be an instrument of God on this earth. I bid farewell to you, asking for God's favor on you for taking these lines into account.

Sincerely,

**Pastor Samuel Fajardo
Cell phone: [REDACTED]**

HONORABLE LEWIS A. KAPLAN

UNITED STATES COURTHOUSE

Southern District of New York

500 Pearl St.

New York, NY 10007-1312

Referente a: United States v. Martinez Turcios, 1:18-cr-00499 (LAK)

Señor juez le escribo esta carta para contarle cómo conocí al Señor Martínez Turcios,

Primero: tendría que decir que lo conocí desde que yo tengo sentido de razón, porque somos vecinos desde niños, la casa donde yo nací y crecí colinda con la de los padres del Señor Martínez en Zamora, municipio de Tocoa, departamento de Colón, Honduras Centroamérica.

Segundo: el Señor Martínez turcios fue un joven con muchas cualidades, en la comunidad de Zamora, servicial, cariñoso, responsable, trabajador, él creció en una familia humilde, donde uno de los principios era el respeto a los demás, él tiene a su familia a la que ama mucho, el Señor Martínez Turcios es muy querido en esta comunidad de Zamora.

Tercero: teniendo yo a mi familia decidí que el Señor Martínez turcios fuera el padrino de bautismo de mis cinco hijos, que se realizó en la iglesia católica de la comunidad, siendo un padrino muy cariñoso con mis hijos, el Señor Martínez Turcios trajo muchos beneficios a la comunidad, por ejemplo: la ayuda con la construcción de la Iglesia Católica de la comunidad, el proyecto de iluminación eléctrica de varios kilómetros de la calle principal, una biblioteca, en la escuela Julio Pineda cuello de esta comunidad, mejoró las calles, construyó una cancha deportiva, mejoramiento de la escuela Zoila Pineda Coello, entregó ayudas a personas de bajos recursos.

Cuarto: el Señor Martínez turcios en este proceso que está pasando está sufriendo mucho, su familia está muy triste, en este momento su mamá se encuentra en silla de ruedas ocasionada por la diabetes, es una enorme tristeza conque ella vive.

Quinto: yo Saihd Abelardo Chávez Isaula como vecino, amigo y compadre de Midence estoy muy triste por el proceso que le está pasando el cual sigo apoyándolo siempre creyendo y confiando en él, porque lo conozco muy bien como un ser humano que ha luchado a base de esfuerzo, estudio y trabajo para lograr metas que se propuso

Sexto: señor juez aprovecho esta oportunidad para pedirle muy respetuosamente que tenga misericordia de mi compadre el Señor Martínez turcios y nos permita que él regrese a su país.

Atentamente

Saihd Chavez

SAIHD CHAVEZ

TEL [REDACTED]

*HONORABLE LEWIS A. KAPLAN
UNITED STATES COURTHOUSE
Southern District of New York
500 Pearl St.
New York, NY 10007-1312*

Regarding: United States v. Martínez Turcios, 1:18-cr-00499 (LAK)

Dear Judge,

I am writing this letter to tell you how I met Mr. Martínez Turcios.

First: I should say that I have known him since I can remember, because we have been neighbors since childhood. The house where I was born bordered that of Mr. Martínez's parents in Zamora, municipality of Tocoa, sector of Colón, Honduras, Central America.

Second: Mr. Martínez Turcios was a young man with many qualities in the Zamora community; he was helpful, loving, responsible, and hardworking. He grew up in a humble family, where one of the principles was respect for others. He has his family, whom he loves very much. Mr. Martínez Turcios is very beloved in this community of Zamora.

Third: Once I had my own family, I decided that Mr. Martínez Turcios would be the godfather of my five children, which took place in the Catholic church of the community, being a very loving godfather to my children. Mr. Martínez Turcios brought many benefits to the community, for example: help with the construction of the Catholic Church of the community, the electrical lighting project of several kilometers of the main street, a library, at the school Julio Pineda Cuello of this community, improved the streets, built a sports court, improvement of the Zoila Pineda Coello school, and provided assistance to low-income individuals.

Fourth: Mr. Martínez Turcios, in this ordeal he is going through, is suffering a lot; his family is very sad. At this moment, his mother is in a wheelchair due to diabetes. It is a huge sadness with which she lives.

Fifth: I, Saihd Abelardo Chávez Isaula, as a neighbor, friend, and good friend of Midence, am very sad about the ordeal he is going through, which I continue to support him, always believing and trusting in him, because I know him very well as a human being who has fought through effort, study, and work to achieve the goals he set out for himself.

Sixth: Your Honor, I take this opportunity to ask you, very respectfully, to have mercy on my good friend, Mr. Martínez Turcios, and allow him to return to his country.

Sincerely,

Saihd Chávez

Zamora, Tocoa, Colón, 16 septiembre, 2024

HONORABLE LEWIS A. KAPLAN

UNITED STATES COURTHOUSE

Southern District of New York

500 Pearl St.

New York, NY 10007-1312

Referente a: United States v. Martinez Turcios, 1:18-cr-00499 (LAK)

Honorable Constancia narrativa de mi vida como amigo de Midence Martínez, Mi nombre es Abraham Medina lo que yo puedo decir en estas líneas es solo la verdad Y es que Soy amigo de Midence desde niños, estuvimos juntos estudiando desde la escuela toda la primaria, jugábamos como todos los demás niños no existía entre nosotros maldad, ya saliendo de la primaria nos separamos cada uno salió a estudiar según su capacidad económica, él se graduó en la academia militar, yo no seguí estudiando, pero a pesar de todo seguimos siendo amigos, ya adultos cuando él regresó de la academia militar jugábamos fútbol y salíamos a pescar por las noches, tiempo después él se lanzó a la política y logró ser diputado en el Congreso Nacional por el departamento de Colón, siendo diputado y siendo yo presidente del patronato de Zamora hizo proyectos como 2 kilómetros de alumbrado eléctrico de la calle de Zamora, también hizo el cerco perimetral del campo de fútbol, hizo una cancha de básquetbol, ayudo a iglesias y a muchas personas, yo nunca lo conocí en un comportamiento inadecuado siempre fue un hombre correcto, de no haber sido así se hubiera terminado nuestra bonita amistad, en los últimos años nos dedicamos, a criar pollos de granja y así nos ayudábamos, Eso es parte de lo que yo puedo dar fe que vivi con Midence y lo que yo puedo describir, le pido por favor considere el buen actuar de Midence para que el pueda regresar pronto.

Atentamente

ABRAHAM MEDINA ZELAYA

CEL. [REDACTED]

Zamora, Tocoa, Colón,

September 16, 2024

HONORABLE LEWIS A. KAPLAN
UNITED STATES COURTHOUSE
Southern District of New York
500 Pearl St.
New York, NY 10007-1312

Regarding: United States v. Martínez Turcios, 1:18-cr-00499 (LAK)

Honorable Judge, this is a description of my life as a friend of Midence Martínez. My name is Abraham Medina. What I can say in these lines is only the truth. And I have been friends with Midence since childhood. We were together studying from school all through elementary. We played like all the other children; there was no malice between us. After leaving elementary, we separated. Each one went to study according to their economic ability. He graduated from the military academy. I did not continue studying, but despite everything, we remained friends. As adults, when he returned from military academy, we played soccer and went fishing at night. Sometime later, he launched into politics and managed to be a congressman in the National Congress for the sector of Colón, being a congressman and I being president of the board of Zamora made projects like 2 kilometers of street lighting of Zamora, he also made the perimeter fence of the soccer field, he made a basketball court, helped churches and many people. I never saw him in inappropriate behavior. He was always an upright man. If it had not been so, our beautiful friendship would have ended. In recent years, we dedicated ourselves to raising farm chickens, and thus we helped each other. That is part of what I can attest to having lived with Midence, and what I can describe. I kindly ask you to consider Midence's good actions so that he can return soon.

Sincerely,

ABRAHAM MEDINA ZELAYA
CEL. [REDACTED]

TOCOA COLÓN, 10 MAYO 2025

**HONORABLE LEWIS A. KAPLAN
UNITED STATES COURTHOUSE**

**Southern District of New York
500 Pearl St.**

New York, NY 10007-1312

Referente a: United States v. Martinez Turcios, 1:18-cr-00499 (LAK)

Estimado juez kaplan

Le saludo muy respetuosamente deseándole Muchos éxitos y bendiciones, mi nombre es Héctor Hernández propietario de ferretería Hernández de la ciudad de Tocoa, Colón. Honduras, tenemos 36 años de tener nuestro negocio y como empresario me siento con mucho pesar por la situación que está pasando nuestro amigo Mldence Martínez, tengo aproximadamente 25 años de conocerlo y después de haber cumplido su periodo como oficial de las fuerzas armadas se dedicó a la compra y distribución de cemento en nuestro departamento, convirtiéndose en uno de los proveedores más grandes de cemento y reconocido en nuestro país, durante nuestra relación comercial como proveedor de cemento en nuestro negocio el Señor Martínez fue un ciudadano ejemplar, honesto, trabajador, responsable, disciplinado, sincero y un excelente amigo, en su entorno familiar ha sido muy responsable dando el ejemplo de trabajo, perseverancia y honestidad, a sus hijos, hermanos y amigos, así mismo generando empleos para las personas de su comunidad. en el año 2014 al 2018 tuvimos la oportunidad de ser compañeros diputados en el Congreso Nacional por diferentes partidos políticos, siendo Midence uno de los diputados con una conducta intachable, disciplinado, respetuoso, amigable y admirado por todos, porque presentó varios proyectos de ley para beneficiar a todos los ciudadanos del departamento de Colón, nos sentimos consternados porque a raíz de esta situación que está pasando nuestro amigo Martínez le ha ocasionado muchos daños emocionales y psicológicos a su esposa hijos y familia en particular y como amigos que conocemos su honorabilidad seguimos firmes hombro a hombro apoyándolo y Sigo creyendo y confiando en él, Seguiremos solidarios porque su familia y yo estamos orando pidiéndole a nuestro padre celestial y a usted señor Juez que tenga misericordia de él y poder tenerlo de nuevo en nuestro país y en nuestra ciudad en el seno de su hogar junto a sus familiares y amigos.

Atentamente_

Héctor Rolando Hernández Cruz

Cel. [REDACTED]

TOCOA COLÓN

MAY 10, 2025

**HONORABLE LEWIS A. KAPLAN
UNITED STATES COURTHOUSE
Southern District of New York
500 Pearl St.
New York, NY 10007-1312**

Regarding: United States v. Martínez Turcios, 1:18-cr-00499 (LAK)

Dear Judge Kaplan,

I respectfully greet you, wishing you much success and blessings. My name is Héctor Hernández, owner of Hernández Hardware Store in the city of Tocoa, Colón, Honduras. We have been in business for 36 years and, as an entrepreneur, I feel very sorry for the situation that our friend Midence Martínez is going through. I have known him for about 25 years and, after he completed his term as an officer in the armed forces, he dedicated himself to the purchase and distribution of cement in our sector, becoming one of the largest suppliers of cement and recognized in our country, during our business relationship as a cement supplier in our business. Mr. Martínez was an exemplary citizen, honest, hardworking, responsible, disciplined, sincere, and an excellent friend. In his family environment, he has been very responsible, setting the example of work, perseverance, and honesty for his children, siblings, and friends, also generating jobs for the people in his community. Between 2014 to 2018, we had the opportunity to be fellow congressmen in the National Congress for different political parties, with Midence being one of the congressmen with impeccable conduct, disciplined, respectful, friendly, and admired by all, because he presented several bills to benefit all citizens of the sector of Colón. We feel dismayed because, as a result of this situation that our friend Martínez is going through, it has caused a lot of emotional and psychological pain to his wife, children, and family in particular. As friends who know his honorability, we continue standing firm shoulder to shoulder supporting him, and I continue to believe and trust in him. We will remain supportive because his family and I are praying, asking our heavenly father and you, Your Honor, to have mercy on him and to be able to have him back in our country and in our city in the bosom of his home alongside his family and friends.

Sincerely,

Héctor Rolando Hernández Cruz
Cell. [REDACTED]

Saba, Colón, Honduras C.A.
30 de marzo 2025

**Honorable Lewis A. Kaplan
United States Courthouse
Southern District of New York
500 pearl St.
New York, NY 10007-1312**

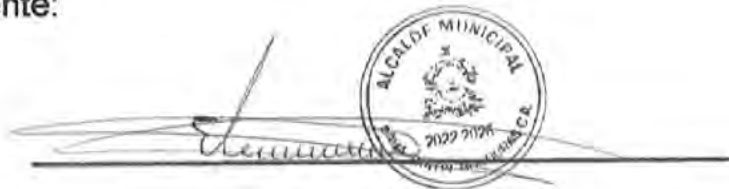
United States v. Martínez Turcios, 1:18-cr-00499 (LaK)

Honorable Juez Kaplan, reciba un respetuoso saludo, le escribo la presente carta para expresarle el concepto que tengo de mi amigo Midence Oqueli Martínez Turcios y darle a conocer un poco de lo que compartí con él, conocí a Midence en el año 2003 un día normal que el llegó a un negocio de lavado de autos y reparación de llantas que yo tenía, el me pregunto dónde podía encontrar unos repuestos, yo le indique que podía encontrarlos en un negocio en el centro del municipio y así sin conocerlo le preste mi carro para que el fuera a buscar los repuestos, y porque prestarle mi carro sin conocerlo? Porque desde el primer momento que empecé a hablar con él me dio la impresión de ser un hombre honesto y educado, luego por coincidencia volví a verlo en una aldea del municipio de Saba que se llama Elixir ahí observe que él le regalo un dinero a una señora que tenía un niño invalido de sus piernas, y eso me comprobó que era un buen hombre, luego coincidimos en la carrera política ya que pertenecíamos al mismo partido y desde ese entonces conozco a Midence y puedo asegurar que es un hombre muy servicial de bueno sentimientos, un líder que siempre estuvo pendiente de su pueblo y sus amigos, un hombre que buscaba la unidad y el bienestar de todos, hizo muchos proyectos mientras fue diputado, ayudo a muchas personas, instituciones e iglesias, Midence es un hombre leal a sus principios por lo que se ganó también mi lealtad y mi respeto, conozco a su madre, a sus hijos, a su esposa, a toda su familia y son personas trabajadoras y honestas, quienes han sufrido mucho emocional y con todo este proceso, con lo poco que he podido he ayudado económicamente a

ellos, ya que su esposa quedo luchando sola y sus hijas están estudiando en la universidad la carrera de medicina, y uno de los deseos de Midence fue que sus hijas no descontinuaran sus estudios a raíz de su extradición y pues los amigos cercanos hemos colaborado en algunas ocasiones ya que no son una familia con muchos recursos económicos, compartí muchas campañas políticas con Midence y siempre lo vi actuar de forma correcta en toda circunstancia, por lo que siempre creeré en mi amigo y estaré para apoyar en lo que pueda, le pido por favor misericordia al momento de dar la sentencia, para que él pueda volver lo antes posible junto a sus hijos, su esposa y su madre que son los más afectados en este proceso y por supuesto habemos muchos esperando su regreso, Dios le bendiga y le ilumine estimado Juez Kaplan.

Me despido de usted. Gracias

Atentamente:



Elin Obed Acuña
Alcalde Municipal de Saba Colón
Cel. [REDACTED]

Saba, Colón, Honduras C.A.

March 30, 2025

Honorable Lewis A. Kaplan
United States Courthouse
Southern District of New York
500 Pearl St.
New York, NY 10007-1312

United States v. Martínez Turcios, 1:18-cr-00499 (LAK)

Honorable Judge Kaplan,

I send you a respectful greeting. I am writing you this present letter to express my opinion of my friend Midence Oqueli Martínez Turcios and to let you know a little about what I shared with him. I met Midence in the year 2003, one day when he arrived at a car wash and tire repair business that I had. He asked me where he could find some spare parts. I indicated that he could find them in a business in the center of the municipality. So, without knowing him, I lent him my car so that he could go look for the spare parts. Why did I lend him my car without knowing him? Because from the first moment I started talking to him he gave me the impression of being an honest and educated man, then by coincidence I saw him again in a village of the municipality of Saba called Elixir there I observed that he gave money to a lady who had a child with a leg disability, and that confirmed to me that he was a good man. Then, we overlapped in our political careers since we belonged to the same party, and since then, I have known Midence. I can assure you that he is a very helpful man with noble feelings, a leader who was always concerned about his people and his friends, a man who sought the unity and the well-being of all. He worked on many projects while he was a congressman. He helped many people, institutions, and churches. Midence is a man loyal to his principles, for which he also earned my loyalty and my respect. I know his mother, his children, his wife, and his whole family, and they are hardworking and honest. They have suffered a lot emotionally with all of this ordeal. With the little I have, I've been able to help them financially since his wife was left fighting alone, and their daughters are studying medicine at the university. One of Midence's wishes was that his daughters would not discontinue their studies due to his extradition, and, well, close friends have collaborated on some occasions, since they are not a family with many economic resources. I shared many political campaigns with Midence, and I always saw him act rightly in every circumstance, so I will always believe in my friend, and I will be there to support him in whatever I can. I ask you to please show mercy at the time of giving the sentence, so that he can return as soon as possible with his children, his wife, and his mother, who are the most affected in this ordeal and, of course, we are all waiting for his return. God bless you and enlighten you, Your Honor Judge Kaplan.

I say goodbye to you. Thank you.

Sincerely,

Elin Obed Acuña Municipal Mayor of Saba Colón
Cell. [REDACTED]

HONORABLE LEWIS A. KAPLAN
UNITED STATES COURTHOUSE
Southern District of New York
500 Pearl St.
New York, NY 10007-1312
Referente a: United States v. Martinez Turcios, 1:18-cr-00499 (LAK)

Estimado juez Lewis kaplan

Mi nombre es Sonia Maritza Rivas, Soy amiga del Señor Midence Martínez, lo conozco desde el año 2008, lo conocí en reuniones políticas del partido liberal, a medida pasaba el tiempo lo fuimos tratando y conociendo más ya que él visitaba nuestras comunidades del municipio de Trujillo, a partir de ahí se fue dando una amistad muy bonita, organizábamos reuniones políticas en barrios y colonias, su liderazgo era muy grande, él era muy aceptado en las comunidades, ya que él se proyectaba y siempre ayudaba a las personas de bajos recursos económicos, lo que más admiraba de él es que nunca decía no, siempre estaba presente y daba respuesta a las solicitudes que le hacían en la comunidades por su proyección, recuerdo que lo buscamos como padrino de graduación en nuestro Centro Educativo y aun siendo diputado y estando muy ocupado no nos dijo que no, le gustaba hacer donación de lámparas para el alumbrado público de las comunidades, para la celebración del Día del Niño siempre llegaba con sus hijas a donar piñatas, dulces, refrescos, pollo y juguetes, para que los niños tuvieran un día bonito, pero todo cambió cuando su nombre se escuchó que era pedido en extradición, fue un día muy triste, mis lágrimas rodaron, muchas personas también estábamos muy apesarados con esta fatal noticia en la comunidad, pero tengo la fe y la esperanza que volverá a su país para estar de nuevo con su familia y amigos que lo queremos y confiamos en él, y así seguir ayudando y proyectándose con los más necesitados, que el bien y la misericordia Dios lo acompañe en todos los días de su vida a mi querido amigo Midence y a usted

Atentamente

Sonia Rivas

HONORABLE LEWIS A. KAPLAN
UNITED STATES COURTHOUSE
Southern District of New York
500 Pearl St.
New York, NY 10007-1312

Regarding: United States v. Martínez Turcios, 1:18-cr-00499 (LAK)

Dear Judge Lewis Kaplan,

My name is Sonia Maritza Rivas, and I am a friend of Mr. Midence Martínez. I have known him since 2008, when I met him at political meetings of the liberal party. As time went by, we got to know him better since he visited our communities in the municipality of Trujillo. From there, a very beautiful friendship developed; we organized political meetings in neighborhoods and communities. His leadership was great; he was very well-accepted in the communities, as he extended himself and always helped people from low economic resources. What I admired most about him is that he never said no; he was always present and responded to the requests made to him in the communities due to his good results. I remember we sought him as a godfather for graduation at our Educational Center, and even being a congressman and being very busy, he did not say no. He liked to donate lamps for the public lighting of the communities, and for the celebration of Children's Day he always arrived with his daughters to donate piñatas, candies, soft drinks, chicken, and toys, so that the children had a nice day. But everything changed when his name was heard to be requested for extradition. It was a very sad day; I shed tears, and many people were also very saddened by this fatal news in the community. But I have faith and hope that he will return to his country to be with his family and friends who love him and trust him, and thus continue helping and extending himself with the most needy. May goodness and mercy accompany him every day of his life for my dear friend Midence and for you.

Sincerely,

Sonia Rivas

Zamora, Tocoa, Colón. 26 mayo, 2025

Honorable Lewis A. Kaplan
United States Courthouse
Southern District of New York
500 Pearl St.
New York, NY 10007-1312
United States v. Martínez Turcios, 1:18-cr-00499 (LAK)

Asunto: Carta de Apoyo al Sr. Midence Oquely Martínez Turcios

Estimado Juez Kaplan.

Me dirijo a usted con el más profundo respeto y con la intención de ofrecer mi testimonio en apoyo del Sr. **Midence Oquely Martínez Turcios**, a quien he tenido el honor de conocer y de cuya persona puedo dar fe. He conocido al Sr. Martínez Turcios durante varios años, desde la década de los noventa cuando yo venía llegando a Tocoa y él trabajaba con sus rastras vendiendo cemento y productos ferreteros, he sido cliente y amigo desde entonces.

El Sr. Martínez Turcios es, en mi experiencia, una persona de cualidades excepcionales. Es un miembro de la familia dedicado y amoroso, un amigo leal en quien siempre se puede confiar, un vecino considerado y un colega/empleo trabajador y respetuoso. Entiendo que el Sr. Martínez Turcios y su familia han pasado por un período increíblemente difícil debido a este proceso legal. He sido testigo del profundo desgaste emocional que esta situación les ha causado. Es desgarrador ver el impacto que esta investigación y procesamiento legal ha tenido en la vida de una persona y una familia que, a mi juicio, son verdaderamente buenas y merecen paz.

Quiero dejar claro que, a pesar de las circunstancias, mi apoyo y confianza en el Sr. Martínez Turcios permanecen inquebrantables. Creo firmemente en su carácter y en su inocencia/en su capacidad de redención y de aprender de esta experiencia. Estoy con él, hombre a hombre, y continuaré siendo un pilar de apoyo en cualquier forma que pueda. Mi convicción en él surge de años de ver su conducta intachable, su honestidad demostrada en situaciones difíciles, la fe que tengo en su capacidad para superar esto y contribuir positivamente a la sociedad. Pido a usted con todo respeto benevolencia en su sentencia para que él pueda volver donde su familia y amigos.

Agradezco sinceramente su tiempo y su consideración en este asunto.

Atentamente,



Abog. Oscar Filander Reyes
Cel. [REDACTED]

Zamora, Tocoa, Colón

May 26, 2025

Honorable Lewis A. Kaplan
United States Courthouse
Southern District of New York
500 Pearl St.
New York, NY 10007-1312

United States v. Martínez Turcios, 1:18-cr-00499 (LAK)

Subject: Letter of Support for Mr. Midence Oquely Martínez Turcios

Dear Judge Kaplan,

I address you with the deepest respect and with the intention of offering my testimony in support of **Mr. Midence Oquely Martínez Turcios**, whom I have had the honor of knowing and of whose character I can attest. I have known Mr. Martínez Turcios for several years, since the 1990s when I was arriving in Tocoa and he was working with his trucks selling cement and hardware products. I have been a customer and a friend since then.

Mr. Martínez Turcios is, in my experience, a person of exceptional qualities. He is a dedicated and a loving family member, a loyal friend whom one can always trust, a considerate neighbor, and a hardworking and respectful colleague/employee. I understand that Mr. Martínez Turcios and his family have gone through an incredibly difficult period due to this legal ordeal. I have witnessed the deep emotional toll that this situation has caused them. It is heartbreaking to see the impact that this investigation and legal prosecution has had on the life of a person and a family that, in my opinion, are truly good and deserve peace.

I want to make it clear that, despite the circumstances, my support and trust in Mr. Martínez Turcios remain unwavering. I firmly believe in his character and his innocence/capacity for redemption and learning from this experience. I stand with him, man to man, and I will continue to be a pillar of support in any way I can.

My conviction in him comes from years of witnessing his impeccable conduct, his honesty demonstrated in difficult situations, and the faith I have in his ability to overcome this and contribute positively to society. I respectfully ask you for leniency in your sentence so that he can return to his family and friends.

I sincerely appreciate your time and consideration in this matter.

Sincerely,

Attorney Oscar Filander Reyes
Cell. [REDACTED]

CARTA

TOCOA, COLON, HONDURAS 1 DE NOVIEMBRE 2024

**Honorable Lewis A. Kaplan
United States Courthouse
South District of New York
500 Pearl St.
New York, NY 10007-1312**

REFERENCIA Al Caso ; United States vs Martínez Turcios, 1:18-cr-00499(LAK)

Estimado Juez Kaplan.

Conozco al sr Martínez Turcios desde 1985 como una persona Humana dada al servicio de las personas y la comunidad donde se desarrollo desde su niñez en un ambiente de hogar familiar muy numerosa y respetada por su conducta y disciplina formada con principios y valores morales arraigados en la unidad familiar.

Las cualidades Personales y profesionales del sr Martínez Turcios han sido conocidas como buen esposo, buen padre, buen hijo, buen hermano, buen amigo, buen vecino, y con un espíritu de servicio a la patria de Honduras sirviendo como militar del Ejercito de Honduras.

El sr Martínez Turcios es querido muy ampliamente en todo el departamento de colon ya que participo en política partidaria logrando así la aceptación como diputado del departamento de colon, lo que le permitió hacer muchas obras sociales en diferentes municipios del departamento de colon, así mismo hizo muchas obras en beneficio de la salud, educación, generación de empleo, vivienda para la gente necesitada de una vivienda, mejoras de vivienda realizo obras de infraestructuras productiva en el área rural, de nuestro departamento, todas estas acciones realizada le dieron el beneficio de seguir como diputado por varios periodos ganando por voluntad popular de nuestra población.

Lamento mucho por lo que ha sucedido al sr Martinez Turcios y su familia ya que es un impacto negativo para su hogar y su familia así como la sociedad que lo vio crecer y desarrollarse y mas a sus hijos de estar creciendo sin su padre, comprendo lo duro que es pasar por un proceso legal de investigación, las consecuencias será el daño emocional que causara a el y su familia

Manifiesto que sigo apoyándolo, creyendo y confiando en el sr Martínez Turcios, continuare solidario con el y su hogar y sus hijos.

Sr Juez aprovecho la oportunidad para pedirle, muestre misericordia al sr Martínez Turcios en su causa del procesamiento legal

Lo saludo muy Respetuosamente,


HECTOR EVELIO RAMIREZ RAZ

HONDURAS

Tocoa, Colón, November 1, 2024

**HONORABLE LEWIS A. KAPLAN
UNITED STATES COURTHOUSE
Southern District of New York
500 Pearl St.
New York, NY 10007-1312**

Regarding: United States v. Martínez Turcios, 1:18-cr-00499(LAK)

Dear Judge Kaplan,

I have known Mr. Martínez Turcios since 1985, as a kind person, dedicated to serving people and the community, where he grew up from childhood in a very large family home environment, and respected for his behavior, disciplined, raised with principles and moral values rooted in family unity. The personal qualities and professional qualities of Mr. Martínez Turcios have been known as a good husband, good father, good son, good brother, good friend, good neighbor and with a spirit of service to the homeland of Honduras, serving in the military in the Honduran army. Mr. Martínez Turcios is widely loved throughout the sector of Colón as he participated in politics, thus achieving acceptance as a congressman in the sector, which allowed him to do many social works in different municipalities of the sector of Colón. Likewise, he did many works for the benefit of health, education, and generated jobs and housing for people in need of a home, improved housing, and carried out productive infrastructure works in the rural area of our sector. All these actions taken gave him the benefit of continuing as a congressman for two terms by the popular will of our people. I deeply regret what is happening with Mr. Martínez Turcios and his family, since this has produced a negative impact on his home and family as well as the society that saw him grow and develop, and more for his children who are growing up without their father. I understand how hard it is to go through a legal investigation ordeal; the consequences will be the emotional pain it generates in him and his family. I express that I continue to support, believe in, and trust Mr. Martínez Turcios. I will continue to stand in solidarity with him and his wife, his home, and his children. Your Honor, I take this opportunity to ask you to show mercy for Mr. Martínez Turcios in his legal case.

I greet you most respectfully,

Héctor Evelio Ramírez Paz
Cel. [REDACTED]

**HONORABLE LEWIS A. KAPLAN
UNITED STATES COURTHOUSE
Southern District of New York
500 Pearl St.**

New York, NY 10007-1312

Referente a: United States v. Martinez Turcios, 1:18-cr-00499 (LAK)

Yo Roger Avelar con domicilio en la ciudad de Trujillo, Colón, Honduras Centroamérica, hondureño, casado, con número de identidad [REDACTED] pastor de la iglesia ministerio evangelista internacional nueva Esmirna, con sede en la ciudad de La Ceiba, Atlántida, Honduras, con resolución número [REDACTED]

Por medio de la presente doy fe que el Señor Midence Martínez originario de la comunidad de Zamora, Tocoa Colón, Honduras, es a quien yo conozco desde el año 1990 y se ha destacado por ser una persona con principios morales y con corazón dispuesto a servir a la sociedad, pero sobre toda la gente pobre, el Señor Martínez posee cualidades como buena conducta, educado, hombre de hogar, padre de familia, fiel a sus principios y que cuando estuvo como diputado nunca se olvidó de los más desamparados, sin otro particular y esperando que esta constancia sea tomada en cuenta siendo la presente para los fines que les he dado convenga

Atentamente
Pastor Roger Avelar

HONORABLE LEWIS A. KAPLAN
UNITED STATES COURTHOUSE
Southern District of New York
500 Pearl St.
New York, NY 10007-1312

Regarding: United States v. Martínez Turcios, 1:18-cr-00499 (LAK)

I, Roger Avelar, residing in the city of Trujillo, Colón, Honduras, Central America, a Honduran citizen, married, with identity number [REDACTED], pastor of the new international evangelist ministry church Esmirna, based in the city of La Ceiba, Atlántida, Honduras, with resolution number [REDACTED]

Through this document, I certify that Mr. Midence Martínez, originally from the community of Zamora, Tocoa Colón, Honduras, is someone I have known since 1990 and has stood out for being a person with moral principles and a heart willing to serve society, but, above all, the poor people. Mr. Martínez possesses qualities such as good conduct, politeness, being a family man, being a family head, being faithful to his principles, and, as a congressman, never forgetting the most disadvantaged. Without further ado, and hoping that this letter is taken into account, this being for the purposes that I have provided.

Sincerely,

Pastor Roger Avelar

EXHIBIT C

Tocoa, Colón, Honduras C.A.
20 de Octubre del 2024

**Honorable Lewis A. Kaplan
United States Courthouse
Southern District of New York
500 pearl St.
New York, NY 10007-1312**

United States v. Martínez Turcios, 1:18-cr-00499 (LaK)

Honorable Señor Juez, le deseo éxitos y bendiciones de lo alto, mi nombre es Heidy Miranda esposa del señor Midence Martínez, antes de empezar a escribir todo lo que mi corazón desea decirle, quiero dar gracias a Dios por darme la oportunidad de poder escribir esta carta, ya que he anhelado con todo mi corazón poder estar frente a usted y poder expresarle tantas cosas, Pero sabía que eso no era posible, pero Dios en su misericordia permitió que yo pudiera escribir esta carta para poder dirigirme a su persona, son tantas las cosas que deseo decir que no sé ni por dónde empezar, conocí a Midence en el año 2009 cuando él estaba en campaña política, tiempo después iniciamos una relación sentimental, me llamó tanto la atención de él que era un hombre tan formal en su forma de vestir, de hablar, de actuar, un hombre tan sabio, tan maduro, tan correcto, paciente que siempre estaba buscando la paz, aun con sus adversarios políticos, tan tolerante que nunca lo vi discutir con nadie, siempre evitaba los problemas, conocí todas las facetas de Midence, como político siendo siempre honesto aun con los adversarios y el área personal, lo conocí como Padre de familia, un padre como pocos, que siempre buscaba pasar tiempo con sus hijos y enseñarles a trabajar y sus hijos tenían la confianza de hablar de todo tipo de tema con él, lo conocí como hijo, trabajando junto a su padre y luego al morir su padre fue el gran apoyo para su madre y sus hermanas, es un hombre que siempre estaba buscando ayudar a todos, siempre preocupándose por todos y eso hizo que yo lo admirara tanto, siendo diputado en el congreso de la república y en todo lo que él hacía, lo vi hacer lo correcto siempre, lo vi trabajar en lo propio como cualquier empleado del campo, admiré siempre su humildad para tratar a los demás, mi mamá tenía una fábrica de ladrillos, ahí los muchachos preparaban el barro con los pies y estando los muchachos llenos de barro, Midence los saludaba y los trataba igual que a cualquier persona y hasta les servía comida y esa humildad de él es admirable, nunca menosprecio ni trato mal a nadie, como diputado hizo muchos proyectos y nunca publicó lo que hacía, yo le preguntaba: por qué no hacía públicas las

ayudas para que la gente supiera lo que él hacía? y él siempre me contestaba: que lo que hiciera la mano derecha no tenía que saberlo la izquierda, durante Mis años de estudio me retiré varias veces de la universidad por problemas económicos y personales, por lo que en muchas ocasiones me sentí desanimada, creyendo que ya no podría graduarme y en esos momentos Midence siempre me decía que continuara, que todo sacrificio tenía una recompensa, siempre me enseñó a ser perseverante, a luchar por mis sueños, a creer en mí, me enseñó a levantarnos a las 4 de la mañana para ir a atender unos cerditos que criábamos para vender, me enseñó a sembrar el zacate para darle de comer a los animales, sembramos sandía y para no pagar muchos empleados hacíamos parte del trabajo nosotros. Aun siendo diputado él hacía todo eso, él se iba los lunes para Tegucigalpa y regresaba los jueves aquí a Tocoa y los días viernes sábados y domingos nos dedicábamos a trabajar, vivíamos en la casa de mi mamá, ya para el año 2018 que él ya no era diputado la rutina era levantarse a las 5 de la mañana irse para el trabajo al campo regresar a las 5 de la tarde, cenar, conversar, ver televisión y dormir y esa era nuestra vida normal.

[REDACTED]

[REDACTED] muchos procesos tanto en la familia de él, como en la mía y él siempre estuvo ahí.

Desde septiembre del 2022 ya vivíamos aparte en una casa rentada puesto que yo rescato animalitos de la calle y necesitaba un espacio para ellos, por eso ya no podía seguir en la casa de mi mamá y Midence aunque en ese momento no entendía mi gran amor por mis animalitos rescatados, aprendió a respetar y apoyar mi labor, y rentamos una casa para que yo tuviera un espacio para ellos, en diciembre del 2022 ocurrió la captura, un 3 de diciembre yo llegué de la iglesia

donde mi mamá a traer a Midence, porque él estaba ahí, íbamos para la casa de mi hermano, era un sábado a las 7 de la noche, yo conducía nuestro carro era un turismo Honda Civic año 2013, solo habíamos avanzado una cuadra de la casa de mi mamá cuando un carro se nos atravesó, se bajaron unos hombres encapuchados, vestidos de civil y empezaron a dispararnos, yo gritaba porque yo pensaba que nos querían secuestrar, nunca pensé que algo tan horrible era una captura, yo retrocedí porque no sabíamos que se trataba de la policía, creíamos que eran unos delincuentes, avancé unas cuadras, pero ellos no siguieron disparando, Hasta que el carro no caminó más y pasó lo de la captura, en ese momento yo sentía que Midence estaba muerto, porque le repito para mí la extradición era el fin de la vida de Midence, pero en ese momento de tanta desesperación y de tanto dolor recordé que él me dijo que estaba orando para que Dios le resolviera la vida y solo le dije a Dios: padre sí esta es tu forma de resolver esto yo la acepto, Solo ayúdame porque no sé qué hacer, yo lloraba por lo que estaba pasando y porque yo no tenía dinero siquiera para viajar a Tegucigalpa a ir a verlo, puesto que en ese momento yo no trabajaba y el dinero que él me daba no ajustaba para ahorrar, solo para los gastos de la casa, pero mi mamá me dio dinero y viaje para Tegucigalpa, en el camino empecé a llamar abogados y ellos creyendo que teníamos dinero, me decían que me cobrarían 600,000 y 800,000 por lo que decidimos con su hijo mayor ir sin abogado a verlo a la unidad militar donde Midence estaba detenido, gracias a Dios nos dejaron verlo y él me dijo que no me preocupara que sería un abogado público que lo representaría, eso me preocupaba porque estábamos en época navideña y los abogados públicos estaban de vacaciones y no tenía quién me ayudara a conseguir los permisos para poder verlo, no me quedó más que confiar en Dios y fue él quien me abrió las puertas y quién me ayudó a conseguir todos los permisos aún sin abogado, fueron días tan difíciles por el miedo y la incertidumbre de lo que iba a pasar, por la separación física de mi esposo, por mi situación económica tan difícil Y por qué no podía ni dormir, porque solo cerraba mis ojos y recordaba esos hombres disparándonos, fue algo muy traumático, Señor Juez estoy pasando una situación tan difícil, hay momentos en qué he sentido que ya no puedo más, que solo la mano de Dios me ha sostenido para poder salir adelante, me han prestado dinero para hacer proyectos de venta de viviendas, Por qué me gradué de arquitecta, pero los proyectos no han salido del todo bien, porque el gobierno ha detenido los préstamos para viviendas, la situación económica no es fácil, ha sido tan difícil para mí vivir en esta casa sola, solo con mis animalitos rescatados, ellos y Dios han sido mi consuelo, así como todos los días le suplico a Dios, también le suplico a usted su misericordia, su benevolencia para que mi esposo pueda volver pronto conmigo, con su madre que ya es una mujer mayor en silla de ruedas y con sus hijos, que sus hijas aún están a mitad de carrera de medicina que con mucho esfuerzo están estudiando, [REDACTED]

[REDACTED]
[REDACTED] ya tengo 38 años, por favor le suplico su misericordia y permita que mi esposo vuelva conmigo y yo pueda volver a sentirme segura, no estar llevando esta carga yo sola con la que siento a veces que ya no puedo más, logre poder tener una volqueta y ponerla a trabajar, pero no es lo mismo yo sola que si el estuviera aquí, cuando yo voy al taller de mecánica no me respetan como lo hacen con un hombre, yo necesito a mi esposo conmigo, necesito tener mi familia, mi hogar y servirle a Dios juntos como matrimonio. Los años pasan y yo no quiero que su madre o mi madre se vayan de este mundo sin volver a verlo, ellas han sufrido mucho por la extradición de él.

Se preguntara porque Midence no tenía un patrimonio económico conmigo fue porque cuando él se separó de la madre de sus hijos, le dejo a ella y a sus hijos lo que él había logrado tener y conmigo pues íbamos empezando de cero,

La separación de el con la madre de sus hijos fue a causa que ella lo traiciono con Javier Rivera, Javier Rivera era un hombre que tenía muchas mujeres, porque razón interesarse en la madre de los hijos de Midence? pues solo por hacer el daño, eso fue en el año 2009, perdone por favor sus faltas, le ruego misericordia en la sentencia, a lo mejor a él le falto sabiduría pero él no es mala persona, es un hombre al que siempre hemos admirado por su comportamiento correcto, por ser tan trabajador, respetuoso, responsable y con tantas virtudes y valores, es un hombre tan hogareño que para cada navidad es el primero que está ayudándome a armar el árbol navideño, él va al cerro a conseguirme plantitas para hacer el pesebre del niño Jesús, cuantas madrugadas se desveló conmigo acompañándome mientras yo trabajaba en los proyectos de arquitectura, una noche yo estaba llorando porque ya eran las 10 de la noche y yo no podía terminar un maqueta de madera porque yo no tenía las herramientas necesarias para trabajar con madera y si no terminaba esa maqueta yo iba a reprobar la clase y el venia llegando cansado de trabajar y aun así me ayudo y estuvimos trabajando toda la noche sin dormir para terminar la maqueta y a las 6 de la mañana que terminamos ya era muy tarde para irme en autobús y llegar a tiempo, porque yo estudie en la universidad Católica a 2 horas de donde mi mama, yo viajaba todos los días y como ya era tarde, a pesar que no habíamos dormido, el me llevo en el automóvil a la universidad a presentar mi proyecto, y así es el, siempre dispuesto para su familia, esas cosas valen mucho, es el hombre que acompañaba a mi mamá al patio a reparar los gallineros o cualquier cosa que ella necesitara la ayuda de un hombre, puesto que mi madre es viuda, mi padre murió hace muchos años, mis hermanas están solteras, Entonces Midence era el único hombre de la casa, era como un padre para mi hermana menor y para mi sobrina que nació un 10 de octubre, el mismo día que Midence y eso formo un vínculo tan fuerte entre

ellos, siempre celebraron el cumpleaños juntos, para ella él es como su papa y ahora cada año que llega esa fecha, la niña me dice que no quiere celebrar, porque sin su tío no hay nada que celebrar y eso me rompe mi corazón, cada fecha especial duele tanto sin él, no sabe cuánta falta nos hace, lo necesitamos, le hemos prometido a Dios que el día que él vuelva nos vamos a casar por la iglesia, le vamos a servir todos los días de nuestra vida, me duele cada vez que yo voy a la iglesia, cada vez que yo sirvo y lo hago sola sin él, yo necesito a mi esposo conmigo, las noches cuando he estado enferma y sola en esta casa, los días en que no he tenido dinero para pagar la renta y he cargado con todo esto yo sola, cada madrugada que despierto sola, no es fácil, solo la misericordia de Dios me sostiene, a pesar de todo doy gracias al Señor por todo esto, porque si no fuera así, tal vez no le hubiéramos conocido como lo hemos hecho, saber que Midence ahora predica la palabra de Dios en la cárcel, me hace poder dar gracias a Dios por este proceso, que sé que va a ser para bien y estoy segura que al salir libre sabremos aprovechar esta nueva oportunidad, porque la sabiduría que dan estos procesos es inigualable, las lecciones que aprendemos son grandes y nos hacen ser mejor ser humano, Señor Juez se lo suplico se lo imploro. Permítanos volver a estar juntos pronto por favor, Estamos en las manos de Dios y en las suyas. Anhele en mi corazón ese día que el regrese, se lo ruego tenga misericordia de nosotros, permítanos tener una segunda oportunidad como familia y como pareja. Necesito a mi esposo.

Bendiciones.

Atentamente:

Heidy Lisseth Miranda Trigueros

Cel. [REDACTED]



Tocoa, Colón, Honduras C.A.

October 20, 2024

Honorable Lewis A. Kaplan
United States Courthouse
Southern District of New York
500 Pearl St.
New York, NY 10007-1312

United States v. Martínez Turcios, 1:18-cr-00499 (LAK)

Honorable Judge,

I wish you success and blessings from above. My name is Heidy Miranda, wife of Mr. Midence Martínez. Before I start to write everything my heart wants to say to you, I want to thank God for giving me the opportunity to write this letter, as I have longed with all my heart to be in front of you and to express so many things, but I knew that was not possible, but God in His mercy allowed me to be able to write this letter to address you. There are so many things I want to say that I don't even know where to start. I met Midence in the year 2009, when he was in a political campaign. Sometime later, we started a romantic relationship. I was so struck by him: he was a man so formal in his way of dressing, speaking, acting, a man so wise, so mature, so correct, so patient that he was always seeking peace even with his political adversaries, so tolerant that I never saw him argue with anyone, he always avoided problems. I knew all the facets of Midence; as a politician always honest even with adversaries and in his personal life, I knew him as a family man, a father like few who sought to spend time with his children and teach them to work and his children had the confidence to talk about all kinds of subjects with him, I knew him as a son working alongside his father and then, when his father died, he was the great support for his mother and his sisters. He was a man who was always looking to help everyone, always concerned for everyone, and that made me admire him so much. I saw him do the right thing always, being a congressman in the republic and in everything he did. I saw him work in his own field as any field employee, and I always admired his humility in treating others. My mom had a brick factory. There, the boys prepared the clay with their feet. While the boys were covered in mud, Midence greeted them and treated them just like any person. He even served them food, and that humility of his is admirable. He worked on many projects as a congressman, and he never advertised what he did. I asked him why he didn't make the aid public so that people would know what he was doing. He always answered me: What the right hand did, the left hand didn't need to know. During my years of study, I withdrew several times from university due to economic and personal problems and, when I was discouraged, believing that I could no longer graduate or that I found the career very difficult, he always encouraged me to continue, that every sacrifice had a reward, he always taught me to persevere, to fight for my dreams, to believe in myself. He taught me to get up at 4 in the morning to take care of some pigs we raised to sell. He taught me to plant grass to feed the animals. We planted watermelon, and to avoid paying many employees, we did part of the work ourselves. Even as a congressman, he did all that. He would leave on Mondays for Tegucigalpa and return on Thursdays here to Tocoa, and on Fridays, Saturdays, and Sundays, we dedicated ourselves to work. We lived in my mom's house. By the year 2018, when he was no longer a congressman, the routine was to get up at 5 in the morning to go to work in the field, returning at 5 in the afternoon, having dinner, chatting, watching television and sleeping and that was our normal life.

[REDACTED]

Many ordeals passed, both in his family and in mine, and he was always there.

Since September of 2022, we were already living separately in a rented house since I rescue little animals from the street and needed a space for them; that is why I could no longer continue in my mom's house. Midence, although he didn't understand my great love for my rescued animals at that moment, learned to respect and support my work, and we rented a house so that I would have a space for them. In December of 2022, the apprehension occurred. On December 3, I arrived from the church at my mom's house to pick Midence up, because he was there. We were going to my brother's house. It was a Saturday at 7 in the evening, I was driving our car, it was a 2013 Honda Civic, we had only gone one block from my mom's house when a car crossed in front of us, some hooded men got out, dressed in civilian clothes and started shooting at us, I was screaming because I thought they wanted to kidnap us, I never thought something so horrible was an apprehension, I backed up because we didn't know it was the police, we thought they were criminals. I moved forward a few blocks, but they kept shooting, until the car wouldn't move anymore. The apprehension happened, and at that moment I felt that Midence was dead, because, as I said before, the extradition was the end of Midence's life. Still, at that moment of so much desperation and so much pain, I remembered that he told me he was praying for God to resolve his life, and I just said to God: Father, if this is your way of resolving this, I accept it, just to help me because I don't know what to do. I was crying because of what was happening and because I didn't even have money to travel to Tegucigalpa and see him, since at that moment I wasn't working and the money he gave me wasn't enough to save, just for household expenses, but my mom gave me money, and I traveled to Tegucigalpa. On the way, I started calling lawyers, and they, thinking we had money, told me that they would charge me between 600,000 and 800,000. So, we decided, with his eldest son, to go without a lawyer to see him at the military unit where Midence was detained. Thank God, they let us see him. He told me not to worry, that he would have a public lawyer to represent him. That worried me because we were in the Christmas season, and public lawyers were on vacation, and I had no one to help me get the permits to see him. I had no choice but to trust in God, and it was He who opened the doors for me and who helped me to get all the permits, even without a lawyer. Those were such difficult days due to the fear and the uncertainty of what was going to happen, due to the physical separation from my husband, due to my very difficult economic situation, and why I couldn't even sleep, because I just closed my eyes and remembered those men shooting at us; it was something very traumatic. Your Honor, I am going through such a difficult situation; there are moments when I have felt that I can no longer go on, that only the hand of God has held me up to be able to move forward. I have been lent money to do housing sale projects, because I graduated as an architect, but the projects have not gone very well, because the government has stopped the loans for housing. The economic situation is not easy; it has been so difficult for me to live in this house alone, only with my rescued animals. They and God have been my comfort. Just as every day I plead with God, I plead with you for your mercy, for your benevolence, so that my husband can return soon to me, to his mother, who is already an elderly woman in a wheelchair, and with his children; his daughters are still halfway through medical school and are studying hard [REDACTED]

[REDACTED] Time does not forgive, and time passes, I am now 38 years old. Please, I plead for your mercy to allow my husband to return to me so I can feel safe again, to feel safe, not to be carrying this burden alone, with which I sometimes feel that I can no longer bear. I managed to get a dump truck and put it to work, but it is not the same me alone as if he were here, when I as a woman go to the mechanic garage, they do not respect me as they do with a man, I need my husband with me, I need to have my family in my home and serve God together as a married couple. The years go by, and I don't want his mother or my mother to leave this world without seeing him again. They have suffered a lot because of his extradition.

You may wonder why Midence did not share any economic assets with me. It was because when he

separated from the mother of his children, he left her and his children what he had managed to have, and with me, we were starting from scratch.

The separation from the mother of his children was because she was unfaithful to him with Javier Rivera. Javier Rivera was a man who had many women, why be interested in the mother of Midence's children, just to do harm, that was in 2009, please forgive him for his offenses, I beg for mercy in the sentence, perhaps he lacked wisdom, but he is not a bad person, he is a man we have always admired for his upright behavior, for being so hardworking, respectful, responsible and with so many virtues and values. He is such a home-loving man that for every Christmas, he is the first one helping me set up the Christmas tree. He goes to the hill to get me little plants to make the nativity scene of the child Jesus. Many early mornings, he stayed up with me, accompanying me while I worked on architecture projects when I was close to graduating, and he was there, encouraging me. He is the man who accompanied my mom to the yard to repair the chicken coops or anytime she needed the help of a man, since my mother is a widow. My father died many years ago, my sisters are single, so Midence was the only man in the house. He was like a father to my younger sister and to my niece, who was born on the same day as Midence's birthday. That formed a bond so strong between them that every year, when that date arrives, the girl tells me that she does not want to celebrate because, without her uncle, there is nothing to celebrate, and that breaks my heart. Every special date hurts so much without him, you don't know how much we miss and need him, we have promised God that the day he returns we will get married in church, we will serve him every day of our life, it hurts me every time I go to church, every time I serve and do it alone without him. I need my husband with me, the nights when I have been sick and alone in this house, the days when I have not had money to pay the rent and I have carried all this alone, every early morning that I wake up alone, it is not easy, only the mercy of God sustains me, despite everything I thank the Lord for all this, because if it were not for this, perhaps we would not have known him as we have. Knowing that Midence now preaches the word of God in prison allows me to give thanks for this ordeal, which I know will be for the better. I am sure that when he is released, we will know how to take advantage of this new opportunity, because the wisdom learned from this ordeal is unmatched; the lessons we learn are great and make us better human beings. Your Honor, I beg you, I implore you, please allow us to be together again soon. We are in the hands of God and yours. I long in my heart for that day he returns. I beg you to have mercy on us, to allow us to have a second chance as a family and as a couple. I need my husband. Blessings.

Sincerely,

Heidy Lisseth Miranda Trigueros
Cell. [REDACTED]

Tocoa Colón. 5 de julio del año 2025

Honorable Lewis A. Kaplan
United States Courthouse
Southern District of New York
500 pearl St.
New York, NY 10007-1312

United States v. Martínez Turcios, 1:18-cr-00499 (LaK)

Estimado Señor Juez, le deseo bendiciones, Soy Emilia Turcios, madre de Midence Oquely Martínez Turcios, él es el primero de mis 15 hijos, o sea es mi hijo mayor, Midence desde pequeño siempre lo recuerdo como un muchacho respetuoso con nosotros sus padres, con los mayores y con sus maestros. Muy trabajador, muy hogareño, amoroso con nosotros y con toda su familia. Siempre ha sido muy querido por la comunidad y por toda la familia porque su comportamiento siempre fue el mejor, siempre Buscando el bien para todos. mi hijo desde de los 7 años me ayudaba a ordeñar un pequeño lote de vacas que en ese entonces teníamos, nos levantábamos a trabajar a la 1 de la mañana para poder bajar del cerro con la leche a las 5 de la mañana, así fue creciendo, dedicado a trabajar y a la vez estudiando, en el año 1977 un gran incendio terminó con nuestra casa y un negocio que teníamos, pasamos tiempos muy difíciles y muy tristes, perdimos todo lo que habíamos logrado construir con mucho esfuerzo, pero por la gracia de Dios mi esposo trabajo con más empeño acompañado por mi hijo Midence que en ese entonces ya tenía 15 años y era su mano derecha, Midence desde muy pequeño sembraba y cosechaba milpas de maíz, cortaba palma, me ayudaba a destazar cerdos porque yo vendía comida, también el operaba un tractor con el cual cosechábamos maíz, salían a trabajar con el papa transportando granos básicos en camiones desde las 5 de la mañana y regresaban a las 8 de la noche, ese ritmo de trabajo lo llevo alrededor de 3 años, gracias a Dios mi hijo nunca causó problemas porque no tenía ningún tipo de vicio, fue un muchacho entregado al trabajo, al estudio y al deporte. Siempre se preocupó por la unidad de la familia y ha sido un apoyo para todos nosotros, recuerdo que en el año 1997 [REDACTED]

[REDACTED] y mi hijo fue el que estuvo conmigo en el hospital día y noche orando para que yo viviera. en su adolescencia lo mandamos a estudiar a la Ceiba para que tuviera un mejor nivel de vida y aun estando fuera de la casa nunca se comportó mal, luego lo mandamos a estudiar a la ciudad de San Pedro Sula donde se graduó de perito mercantil, pero en sus vacaciones siempre venía a trabajar junto a su papá.

Luego dijo que deseaba estudiar en la academia militar donde se graduó con honores y años después obligado por el trabajo familiar y el apoyo que se necesitaba en la familia de parte del el, se retiró de la academia militar y se dedicó a trabajar en el transporte, Hasta que logró montar una ferretería y se convirtió en el más grande distribuidor de cemento de la zona, hasta que equivocadamente se convirtió en político y le digo equivocadamente porque sé que eso fue lo que trajo a la vida de mi hijo los problemas que él está atravesando, en el año 2013 murió mi esposo y ahí Midence fue aún más un gran apoyo para mí y sus hermanas menores,

██████████ tengo 80 años y hace unos años ██████████ estoy en silla de ruedas y Midence fue el que siempre estuvo conmigo y no tiene idea ahora la falta que me hace mi hijo. Ya que no puedo valerme por mí misma y él es el hijo que siempre ha estado pendiente de mí, él era quien me llevaba al doctor y quién siempre estaba pendiente de mi salud, me hace mucha falta, este ha sido un proceso muy duro sin mi esposo y sin mi hijo y estando en esta silla de ruedas, mi mayor miedo todos los días es morir y no ver a mi hijo en libertad junto a mí, sé que si él estuviera aquí él ya me hubiera llevado a hacer las terapias que necesito hacer para ponerme mi prótesis, pero eso es lo que menos me importa, lo que si deseo con todo mi corazón es volver a abrazar a mi hijo, volver a verlo y no puedo hacer más que orar, esperar en Dios y también suplicarle a usted que por favor permita que mi hijo vuelva lo más antes posible antes que yo muera, sé que por mi condición no me quedan muchos años en esta tierra y no quiero morir sin ver a mi hijo en libertad junto a mí, le suplico su misericordia y permita que mi hijo vuelva a casa, somos una familia muy trabajadora y muy honesta todo el que nos conoce puede dar fe de eso, por lo que siempre criamos a nuestros hijos con principios y valores, pero yo le pido perdón a usted, a Dios y a su país si en algo fallamos como padres o si en algo falló mi hijo y que por favor nos permita volver a estar juntos lo antes posible, te suplico su misericordia y me permita volver a abrazar a mi hijo, no tengo ni el dinero, ni la visa, ni la salud para viajar a verlo dónde está él ahora. Solo me queda esperar en Dios y en usted que me permitan abrazar a mi hijo nuevamente. Le ruego tome en cuenta estas palabras de una madre necesitada de su misericordia. Dios me lo bendiga

Emilia Turcios Rosales

Cel. ██████████

Emilia Turcios Rosales

Tocoa Colón

July 5, 2025

**Honorable Lewis A. Kaplan
United States Courthouse
Southern District of New York
500 Pearl St.
New York, NY 10007-1312**

United States v. Martínez Turcios, 1:18-cr-00499 (LAK)

Dear Judge,

I wish you blessings. I am Emilia Turcios, mother of Midence Oquely Martínez Turcios. He is the first of my 15 children; that is, he is my oldest son. Ever since Midence was little, I always remember him as a respectful boy to us, his parents, to the elderly, and to his teachers. He was very hardworking, very home-loving, loving to us and to all his family. He has always been very loved by the community and by the whole family because his behavior was always the best, always seeking the good for all. Ever since my son was 7 years old, he helped me milk a small herd of cows that we had at that time. We would get up to work at 1 in the morning so we could go down the hill with the milk at 5 in the morning. That's how he grew up, dedicated to working and, at the same time, studying. In 1977, a great fire burned our house and a business we had, we went through very difficult and very sad times, we lost everything we had managed to build with a lot of effort, but by the grace of God my husband worked harder, accompanied by my son Midence, who at that time was already 15 years old and was his right hand. Midence, since he was very young, planted and harvested cornfields, cut palm, helped me butcher pigs because I sold food, he also operated a tractor with which we harvested corn, they would go out to work with dad transporting basic grains in trucks from 5 in the morning and returned at 8 at night, that work rhythm lasted around 3 years, thank God my son never caused problems because he had no type of bad habits, he was a boy dedicated to work, study and to sports. He has always cared about family unity and has been a support for all of us. I remember that in 1997, I [REDACTED] and my son was the one who was with me in the hospital day and night, praying for me to live. In his adolescence, we sent him to study in La Ceiba so that he could have a better quality of life. Even being away from home, he never behaved badly. We sent him to study in the city of San Pedro Sula, where he graduated as a commercial expert, but during his vacations, he always came to work with his dad.

Then he said that he wished to study at the military academy, where he graduated with honors. Years later, forced by family work and the support that was needed in the family from him, he withdrew from the military academy and dedicated himself to working in transportation. He managed to open a hardware store and became the largest distributor of cement in the area, until he mistakenly became a politician. I say mistakenly because I know that this was what brought to my son's life the problems he is going through. In 2013, my husband died, and Midence was even more of a great support for me and his younger sisters. [REDACTED]. I am 80 years old, and a few years ago, [REDACTED]. I am in a wheelchair, and Midence was the one who was always with me. You have no idea how much I miss my son. Since I cannot take care of myself and he is the son who has always been attentive to me, he was the one who took me to the doctor and who was always concerned about my health. I miss him a lot; this has been a very hard ordeal without my husband and my son and being in this wheelchair, my greatest fear every day is dying and not seeing my son free with me, I know that if he were here he would have already taken me to do the therapies that I need to do to get my prosthesis, but that is the least of my concerns, what I truly wish with all my heart is to hug my son again, to see him again. I can do nothing but pray, wait on God, and also plead with you to please allow my son to return as soon as possible before I die. I know that due to my condition, I do not have many years left on this earth, and I do not want to die without seeing my son free with me. I beg you for your mercy and allow my son to come home. We are a very hardworking

and honest family. Everyone who knows us can attest to that, so we always raised our children with principles and values. But I ask you forgiveness from you, from God, and from your country if we failed in any way as parents, or if in any way my son failed, and please allow us to be together again as soon as possible. I plead for your mercy and to allow me to hug my son again. I have neither the money, nor the visa, nor the health to travel to see him where he is now. I can only wait on God and on you to allow me to hug my son again. I beg you to take into account these words from a mother in need of your mercy. God bless you.

Emilia Turcios Rosales

Cel. [REDACTED]

TRANSLATION

**Honorable Lewis A. Kaplan
United States Courthouse
Southern District of New York
500 Pearl St.
New York, NY 10007-1312**

United States v. Martinez Turcios, 1:18-Cr 0049 (LAK)

Estimado Juez Kaplan. Es un gusto saludarle, Mi nombre es Tania Samira Martínez Aguilar, soy la hija de Midence Oquely Martínez Turcios con mucho respeto te escribo esta carta para que sepas el maravilloso ser humano que es mi bello padre Martínez Turcios al que amo con todo mi corazón.

Mi padre el Sr. Martínez Turcios como persona es un Excelente ser humano, siempre he dicho que es mi ejemplo a seguir un papa intachable, bondadoso servicial que ayuda a las demás personas es un papa sencillo humilde y como persona el mejor ser humano le pido señor Juez de lo más profundo de mi corazón que tome en cuenta mis palabras y espero y confié en Dios Todo Poderoso que mi papa estará pronto con nosotros.

Puedo decir que me siento dichosa afortunada por el Padre ejemplar, admirable, amoroso, especial que Dios me dio, un padre que ha estado en todo momento en mi vida es el padre que soñé es mi confidente tuve una niñez muy bonita una Familia llena de amor, comprensión, alegría que cualquier persona quisiera tener yo recuerdo de niña que salía a correr con mi bello padre al par de el en un campo grande todas las mañanas vivíamos en Tegucigalpa estaba muy pequeña para mí

siempre ha sido mi súper héroe el padre perfecto, recuerdo que corría sin parar al par de él porque sabía que estaba al lado del amor de mi vida.

Señor Juez y distinguido Lewis A. Kaplan le pido de lo más profundo de mi corazón que regrese a mi Padre él es mi todo sufro en silencio, pero tengo Fe en Dios que pronto lo tendré conmigo. Él siempre me ha llamado Tanatanina y para siempre ha sido una gran alegría escucharlo que me llame haci, también me dice mi grandulona venga he sido una hija que no me podían hablar suave ni fuerte porque yo pensaba que me estaban regañando y siempre llegaba donde mi papi llorando desconsolada y mi padre me decía hija que tiene y yo le decía porque usted me llamo y venia él y me consolaba con sus abrazos, con sus palabras de amor. Es un padre que siempre he tenido la confianza de sentarme hablar con el de todo lo que pasa alrededor de mí, algún dolor puede ser leve o fuerte, un problema y siempre me dice cómo puedo resolver las cosas y si me equivoque el me corrigió el me escucha el me entiende el me protege siempre al igual que ha cuidado y estado siempre para mi hijo, no solamente es un abuelo es un padre mi hijo le dice Papi. Es un padre que me motiva cada día y me dice hija siga adelante sé que con la ayuda de Dios Todo es posible. Cada día siento que me hace falta una parte de mí y es el amor de mi vida mi Padre. Un día jugando me caí y me raspé la rodilla no dejaba que nadie me curara que no fueran las manos de mi papito lindo porque yo sentía que con él no me dolía nada porque sentía su amor de padre.

Salmo 55: No hay adversidad, ni enemigo grande cuando se cuenta con el poder de Dios.

Porque este texto porque todo es un proceso que se sufre y se llora se pasan angustias, pero Dios es el único que nos da la Fortaleza y que todo estará bien.

El Sr Martínez Turcios es digno de admirar, un hombre bondadoso, amable con la capacidad de proveer y ayudar a su comunidad, personas y familia.

Su servicio comunitario dono el fluido eléctrico de toda la pavimentada del campo de futbol ha ayudado a familias de bajos recursos con alimentos y vestimentas que ha sido digno de admirar que sale de lo más profundo de mi corazón. Como lo dice la palabra

2 corintios 8-13 “Dios Ama al Dador Alegre”

Como familia hemos pasado angustias, miedos, tristezas a raíz de todo este proceso que no ha sido nada fácil, pero todo lo hemos puesto en las manos de Dios he clamado, he llorado, pero tengo Fe que pronto tendremos a mi padre con nosotros.

Señor Juez le pido que tenga misericordia del Sr Martínez Turcios sus hijos y su familia lo esperamos.

Tania Martínez

[REDACTED]

HONORABLE LEWIS A. KAPLAN
UNITED STATES COURTHOUSE
Southern District of New York
500 Pearl St.
New York, NY 10007-1312

Regarding: United States v. Martínez Turcios, 1:18-cr-00499 (LAK)

Dear Judge Kaplan,

It is a pleasure to greet you. My name is Tania Zamira Martínez Aguilar. I am the eldest daughter of Midence Martínez Turcios. I respectfully write you this letter so that you know what a wonderful human being my beautiful father Martínez Turcios is, whom I love with all my heart. My father, Mr. Martínez Turcios, as a person is an excellent human being. I have always said he is my example to follow, an impeccable dad, kind, helpful, who helps other people, a simple, humble dad, and as a person, the best human being that I have known. I ask you, Your Honor, from the bottom of my heart, that you take my words into account, and I hope and trust in Almighty God that my dad will soon be with us. I can say that I feel blessed and fortunate for the admirable, loving, special, exemplary father that God gave me, a father who has been there for me at all times in my life, he is the father that I dreamed of, he is my confidant, I had a very beautiful childhood, a family full of love, understanding, and joy. I remember as a child that I would run with my beautiful father next to him in a big field every morning. We lived in Tegucigalpa. I was very small. For me, he has always been my superhero, the perfect father. I remember I would run non-stop next to him because I knew I was by the side of the love of my life. Distinguished Judge Lewis Kaplan, I ask you from the deepest part of my heart to help me so that my father returns. He is my everything, I suffer in silence. But I have faith in God that I will soon have him with me. He has always called me: Tanatanina, and for me, it has always been a great joy to hear him call me that. He also says: "My big girl, come here." I have been a daughter who could not be spoken to loudly because I thought they were scolding me and I would always go to my daddy crying inconsolably. My father would say to me: "Daughter, what is it?" and I would say: "Because you called me." I would go to him and he would comfort me with his arms and his words of love. He is a father whom I have always trusted to sit and talk with him about everything that happens around me. Some pain and problems can be mild or strong, and he always tells me how I can solve things and, if I am wrong, he corrects me, listens to me, understands me, and always protects me just as he has cared for and has always been there for my son. He is not only a grandfather but a father to my son. My son calls him daddy. He is a father who motivates me every day and tells me, "Daughter, keep going." I know that with God's help, everything is possible. Every day, I feel that I am missing a part of me, and it is the love of my life, my father. One day while playing, I fell and hurt my knees. I wouldn't let anyone heal me except for the hands of my dear daddy, because I felt that with him, nothing hurt me because I felt his love as a father, it is an ordeal when you suffer and cry, and you go through anguish, but God is the only one who has given me strength and that everything will be fine. Mr. Martínez Turcios is a man worthy of admiration, a kind, friendly man, with the ability to provide help to the community and to many people through his community service. He donated electricity to many communities. He always helped low-income people with food and clothing. He has been worthy of admiration. This comes from the depths of my heart. The family has gone through anguish, fears, and sadness as a result of all of this ordeal which has not been easy at all, but we have put everything in the hands of God. I have cried out, I have cried, but I have faith that soon my father will be with us. Sir, I ask you to have mercy on us, his children, and his family, who are waiting for him.

Tania Martínez
[REDACTED]

Honorable Lewis A. Kaplan

United States Courthouse

Southern District of New York

500 Pearl St.

New York, NY 10007-1312

United States v. Martínez Turcios, 1:18-cr-00499 (LAK)

Estimado juez Kaplan

Mi nombre es Alpha Gabriela Martínez Aguilar, soy la 3ra de 5 hijos de Midence Oquely, me dirijo hacia usted para hacerle saber un poco de lo que ha sido mi papa; como ser humano, hermano, hijo, amigo, pero sobre todo como un maravilloso padre el cual ha estado presente en todos los momentos de mi vida.

Mi papa, es el mayor de 15 hermanos, es un hombre el cual he admirado, siempre me hablaba de todo lo que ha hecho a lo largo de su vida, donde realizó sus estudios, como trabajo con mi abuelo desde que era un niño, y de todos los sacrificios que tuvo que hacer para poder ser un profesional. Me encantaba que me contara sus historias como estudiante porque es una persona muy inteligente, y gracias a esto, su dedicación y disciplina siempre era el 1er lugar. Por esto y muchas cosas más, estoy muy orgullosa de él y es mi ejemplo a seguir.

Ha sido una persona honorable, servicial, amable, que no solo se preocupa por el sino por las demás personas, me ha inculcado muchos valores desde que soy pequeña, siempre me decía que tenía que ser humilde, que debía saludar con respeto a cualquier persona sin importar quien fuera.

Gracias a lo que él ha sido guardo recuerdos muy bonitos en mi niñez, recuerdo una vez cuando tenía 5 años era la única en nuestra casa que se sabía su número de teléfono, siempre me han gustado los camarones, entonces como el salía a trabajar y a veces en mi casa no me daban mi comida favorita, yo pedía teléfonos prestados para poder llamarlo y decirle que no me querían dar mis camarones porque sabía que el trataba que siempre me dieran la comida que quería, entonces ahí el llamaba que me hicieran mi comida; en todo momento ha estado pendiente que tengamos lo que necesitamos, ha sido un padre atento, amoroso, muchas veces nos decía que quería que tuviéramos cosas que tal vez el no pudo. Cuando el regresaba de viaje, lo íbamos a recibir al carro porque en todos sus viajes el volvía con muchos juguetes y eso me llenaba de mucha felicidad. Gracias a Dios y a mi papi nunca me faltó ropa, juguetes, comida y mucho amor.

Desde niña he sido muy miedosa, me dan miedo los animales, el río y también la lluvia; él es quien me ha ayudado a enfrentar mis miedos; cada vez que llovía lo iba a buscar a él, y le pedía que, si podía dormir con él porque tenía miedo, sus palabras eran si gordito acuéstese aquí y me acostaba con él, por esto es que mis ojos lo ven como la persona que me va a proteger ante cualquier circunstancia. Cuando era pequeña él me decía gordo o gordito, tengo 26 años y aún me sigue tratando como si fuese esa pequeña gordita que sus ojos miraban.

Toda mi vida me ha encantado celebrar mi cumpleaños, unos días antes de la fecha, empezaba a decir que ya iba a ser mi cumpleaños porque me encantaba ese día, recuerdo una vez que mi papi estaba almorzando yo venía llegando de la escuela y solo llegue a decirle que me celebrara mi cumpleaños en la escuela, al principio no estaba muy de acuerdo, pero me puse a llorar y ahí él accedió, en ese mismo instante me mando con mi mami a comprar mi piñata, dulces y todo lo necesario para poder celebrar, él sabía lo feliz que esto me hacía por eso nunca me dijo que no, eso no solo fue en mi infancia a lo largo de los años seguía complaciendo lo que tanto me gustaba, todavía recuerdo que la última vez que celebre mi cumpleaños fue el número 23, lo quería celebrar pero no tenía el dinero suficiente, tenía mis ahorros pero aun así me faltaba la mitad para poder celebrarlo fui donde él y le dije lo que quería hacer y como era de esperarlo me dijo: “hija usted sabe que mientras yo pueda siempre le voy a dar lo que usted quiera” así fue como lo celebre y ahí estaba él complaciéndome como siempre lo había hecho.

Mi papa Midence Oquely ha estado conmigo en cada paso de mi vida, recuerdo la primera vez que me llevo a la escuela estaba en primer grado era una niña de 5 años que iba a empezar una nueva aventura y ahí estaba él motivándome a dar lo mejor de mí, así mismo estuvo conmigo en mi primer día de universidad, que aún lo tengo muy presente ya que iba a algo totalmente diferente un nuevo ambiente, una nueva ciudad, nuevas personas, pero mi papi siempre estaba ahí para orientarme en cada paso de mi vida.

Aún tengo presente el momento en que empezaron a mencionar a mi papi, fue algo muy impactante para toda nuestra familia, sin embargo, nunca nos hemos dado por vencido, ya que Dios nos ha dado la fuerza para poder enfrentarlo. Tratamos de sacar lo mejor de todo lo que ha pasado, confiamos en el propósito que Dios tiene para la vida de mi papi, no todo ha sido malo, pues gracias a esto él ha mejorado en muchos aspectos, se ha vuelto muy cercano a Dios, no hay día en el que no me diga que debo seguir el camino de Dios, pues él es el único que me llevara por el camino correcto. Cuando todas las noticias surgieron tuve que pausar mis estudios, pero mi papi nunca se ha dado por vencido, él me dice que no descansara hasta que yo culmine, con mucho esfuerzo él me ha cumplido el que yo pueda seguir estudiando la carrera con la que he soñado desde que era una niña.

Para mí han sido momentos muy difíciles los que he tenido que pasar porque toda mi vida él ha estado conmigo en la salud, enfermedad, en mis momentos de alegría, mis momentos de tristeza. Nunca había pasado un cumpleaños sin él, una navidad o una fecha importante, ahora

puede ser que no estemos cerca físicamente, pero siempre está presente, aunque sea por una llamada, tengo fe en Dios que pronto estaremos juntos de nuevo, porque yo sueño y todos los días le pido a Dios que me permita volver a estar con él, siempre lo voy a estar esperando porque aún tenemos muchas metas y sueños que cumplir juntos, ya que anhelo volver a verlo en navidad dándome el abrazo de media noche, acompañándome en mi cumpleaños, o simplemente sentarme a ver la TV con él, pero más que todo porque mi mayor deseo es que el día que yo me convierta en una doctora él esté presente en el momento que me entreguen mi título y poder celebrarlo con él y mi familia.

Las palabras se quedan cortas para explicar todo lo que él representa en mi vida, pero sin importar que siempre voy a estar orgullosa y agradecida del padre que me toco, su dedicación, fortaleza y el amor que me ha mostrado a mí, mis hermanos y familia me inspiran cada día. Ver todo lo que ha logrado y como siempre tenía tiempo para ayudar a otras personas me ha hecho que me llene de mucha admiración hacia él.

Le pido su misericordia y que sea Dios quien actúe a través de usted.

Lo saludo muy respetuosamente.

Alpha Gabriela Martínez Aguilar

cel. [REDACTED]

Honorable Lewis A. Kaplan
United States Courthouse
Southern District of New York
500 Pearl St.
New York, NY 10007-1312

United States v. Martínez Turcios, 1:18-cr-00499 (LAK)

Dear Judge Kaplan,

My name is Alpha Gabriela Martínez Aguilar, I am the 3rd of 5 children of Midence Oquely, I am writing to you to let you know a little about what my dad has been; as a human being, brother, son, friend, but above all as a wonderful father who has been present in all the moments of my life.

My dad is the oldest of 15 siblings. He is a man whom I have admired. He always talked about everything he has done throughout his life, where he studied, how he worked with my grandfather since he was a child, and all the sacrifices he had to make to be able to be a professional. I loved that he would tell me his stories as a student because he is a very intelligent person, and thanks to this, his dedication and discipline always put him in 1st place. For this and many more reasons, I am very proud of him, and he is my role model.

He has been an honorable, helpful, kind person who not only cares about himself but also for other people. He has instilled many values in me since I was little. He always told me that I had to be humble and that I should greet anyone with respect, regardless of who they were. Thanks to what he has been, I keep very beautiful memories from my childhood, I remember once when I was 5 years old I was the only one in our house who knew his phone number, I have always liked shrimp, so since he went out to work and sometimes at my house they wouldn't give me my favorite food, I would borrow phones to be able to call him and tell him that they didn't want to give me my shrimp because I knew he tried to always give me the meal I wanted, so he would call to have them make my food; he has always been attentive to ensure we have what we need. He has been an attentive, loving father. Many times, he told us that he wanted us to have things that maybe he couldn't have. When he would return from a trip, we would go to greet him at the car because on all his trips, he would come back with many toys, and that filled me with a lot of happiness. Thanks to God and my dad, I never lacked clothes, toys, food, and a lot of love.

Since I was a child, I have been a scaredy-cat; I am afraid of animals, the river, and also the rain. He is the one who has helped me face my fears; every time it rained, I would look for him, and I asked him if I could sleep with him because I was scared, his words were, "Sure Gordito, lie down here," and I would lie down with him, that's why my eyes see him as the person who is going to protect me in any circumstance. When I was little, he would call me "Gordito" (*translator note: a term of endearment meaning "little chubby"*); I am 26 years old and he still treats me as if I were that little chubby girl that his eyes looked at.

All my life I have loved to celebrate my birthday. A few days before the date, I would start saying that it was going to be my birthday because I loved that day. I remember one time my dad was having lunch and I was just arriving from school, and I just got to tell him to celebrate my birthday at school. At first, he wasn't very much in agreement, but I started to cry, and then he agreed. At that very moment, he sent me with my mom to buy my piñata, candies, and everything necessary in order to celebrate. He knew how happy this made me, that's why he never said no. That was not only in my childhood; over the years, he kept pleasing me so much. I still remember that the last time I celebrated my birthday was number 23. I wanted to celebrate, but I didn't have enough money. I had my savings, but still, I was missing half to be able to celebrate. I went to him and told him what I wanted to do and how it was to be expected. He said to me: "Daughter, you know that as long as I can, I will always give you what you want." That's how I celebrated it, and there he was, pleasing me as always. He had done it.

My dad, Midence Oquely, has been with me every step of my life. I remember the first time he took me to school. I was in first grade. I was a 5-year-old girl who was going to start a new adventure, and there he was, motivating me to give my best. He was also with me on my first day of university, which I still remember very well since I was going to something completely different: a new environment, a new city, new people, but my dad was always there to guide me in every step of my life.

I still remember the moment they started mentioning my dad. It was something very shocking for our whole family; however, we have never given up, because God has given us the strength to face it. We try to make the best of everything that has happened, we trust in the purpose that God has for my dad's life, and not everything has been bad, because thanks to this he has improved in many aspects, he has become very close to God, there is not a day that he doesn't tell me that I should follow the path of God, for he is the only one who will lead me on the right path. When all the news came out, I had to put my studies on pause, but my dad has never given up. He tells me that he will not rest until I finish. With a lot of effort, he has ensured that I can continue studying the career I have dreamed of since I was a little girl.

For me, there have been very difficult moments that I have had to go through because all my life he has been with me, in health, illness, in my moments of joy, my moments of sadness. I had never spent a birthday, a Christmas, or an important date without him. Now it may be that we are not physically close, but he is always present, even if it's just by a call. I have faith in God that we will soon be together again, because I dream and every day I ask God to allow me to be back with him, I will always be waiting for him because we still have many goals and dreams to fulfill together. I long to see him again at Christmas giving me the hug of midnight, accompanying me on my birthday, or simply sitting down to watch TV with him but, more than anything, because my greatest wish is that the day I become a doctor he is present at the moment they hand me my degree and be able to celebrate it with him and my family.

Words fall short to explain everything he represents in my life, but no matter what, I will always be proud and grateful for the father I got. His dedication, strength, and the love he has shown to me, my siblings, and family inspire me every day. Seeing everything he has achieved and how he always had time to help other people has filled me with a lot of admiration for him.

I ask for your mercy and that it is God who acts through you.

I greet you very respectfully,

Alpha Gabriela Martínez Aguilar

Honorable Lewis A. Kaplan
United States Courthouse
Southern District of New York
500 Pearl St.
New York , NY10007-1312

United States v. Martinez Turcios. 1:18-cr-00499(LAK)

"Estimado Juez Kaplan"

Mi nombre es Andrea Rachell Martínez Aguilar, me dirigo hacia usted honorable juez con todo respeto para pedirle ser escuchada y que pueda saber un poco de la vida de mi papá plasmada en mi historia.

Quiero contarle la historia de mi papá reflejada a lo que él es para mi, el príncipe azul de mi cuento de hadas. Regresando a mis memorias del pasado; tengo muy bien plasmado el amor que recibí de mi papá. De pequeña dormía con sus camisas porque me quedaban holgadas y eran muy suaves, papá siempre decía hija ya me quede sin camisas pero terminaba diciendo.... Mi chiquita de papá.

Mi papi a veces regresaba tarde de trabajar, él manejaba rastras y yo no podía dormir hasta que él llegara, no importaba cuantos días fueran ni la hora, su princesa siempre espero en esa puerta por su papá, hasta que finalmente papi llegaba; le pedía si podíamos jugar... a lo que él respondía si mi niña, pasa que desde siempre me ha gustado mucho la cocina; entonces él me ponía una silla frente a la estufa y las ollas de mamá, mientras yo le preparaba una deliciosa sopa imaginaria, papi me decía solo 30 minutos hija pero terminaba accediendo 5 minutos más, lo que para mi hoy en día han sido los cinco minutos oro para lo que resta de mi vida.

Un día a mi hermana y a mi se nos ocurrió la idea que queríamos una muñeca de nuestro tamaño, que para ese entonces nunca habíamos visto una, papi hizo lo imposible hasta que logró que tuviéramos la muñeca de nuestros sueños.

Me costaba mucho dormir sola porque tenía muchas pesadillas pero sobre todo porque sentía que era muy pequeña para no estar con papá, así que todos las noches esperaba que fuera tarde e iba silenciosamente a despertar a papi para poder decirle papi puedo dormir con usted, siempre recuerdo que le daba unos sustos inmensos pero decía si hija acuéstese aquí conmigo. Voy a contar mi secreto, yo me hacia pipi y me despertaba y le decía a mi papi..... papi me orine y él decía no importa hija, me cambiaba, ponía toallas y nos acostábamos nuevamente, mi mamá decía no les interesa dormir con las costillas mojadas. Pero la verdad es que no, siempre y cuando yo tuviera mi lugar seguro con quien dormir.

Salimos mucho de viaje e íbamos siempre en familia, recuerdo que siempre nos peleábamos porque quien comía a lado de papá o por quien sujetaba su mano... a los largo de los años es la única mano que nunca quiero soltar por el resto de mi vida.

Papá siempre se esforzó por darnos todos los juguetes que queríamos, por llevarnos a lugares bonitos, por ser un papá presente, por darnos amor, por enseñarnos a ser educados, responsables, inteligentes. Él siempre fue número uno en todo, así que desde chiquitos nos impulsó a todos a ser siempre el mejor y dar lo mejor.

Cuando finalmente crecí, ya en el colegio papá siempre supervisaba nuestras notas, nos regañaba cuando tenía que ser necesario, pero siempre nos ayudaba y nos mostraba muchos métodos de estudios para poder lograr nuestros objetivos. Siempre nos impulsó a lograr nuestros sueños y nos motivaba a ser el número uno.

Llegue a mi etapa de adolescencia donde papá ya no daba permisos para salir, yo me enojaba mucho y lloraba pero él decía, hija es muy peligroso; hoy yo agradezco eso porque gracias a él, a sus decisiones y a sus cuidados, soy la mujer que soy gracias a él y a lo que me ha enseñado.

Mi papá decidió llamarme Rachell, pero en el colegio me hacían burla por ello y llorando le decía papi cámbieme el nombre, él me decía que si, pero terminaba diciéndome hija su nombre es bonito, se lo puse por la presentadora Rashel Díaz, así que usted tiene que estar orgullosa de su nombre. Hasta que finalmente lo entendí y empecé a querer mi nombre.

Para los eventos del día del padre en mi colegio papi siempre estuvo presente, jugaba, comía. Siempre fue un papá presente. En mi casa le preparábamos una sorpresa y le decorábamos la oficina con muchos globos y muchas cartas donde le decíamos lo mucho que lo amamos y lo admiramos.

Cada cumpleaños de papi tratamos de ser los mejores hijos y de hacerlo muy feliz.

Cada día del niño no podía faltar el regalo de papi, incluso siendo ya adulta nunca dejo de darnos nuestro regalo. Este año, 2024 ha sido el primer año donde no recibo un regalo de día del niño por mi papá y es un golpe duro de realidad, pero tengo la esperanza que habrán mis días del niño y que ese regalo regresará.

Papi también me enseñó a luchar a entender que las cosas se ganan trabajando, esforzándonos para salir adelante, así que un día decidí pedirle trabajo y me dio, así que todos los días a las 5 de la mañana salimos a trabajar al campo, yo era una niña sobreprotegida que no sabía hacer muchas cosas, así que mi papi me enseñó a trabajar desde cero. Desde cosas tan simples como recoger la basura, buscar un orden, buscarle una estabilidad a todo. Me enseñó a ordeñar vacas, a aplicarles medicamentos, a saber las dosis de los medicamentos, me enseñó a cortar césped, me enseñó a cargar palma, a sembrar frutos, arboles, alimentos. Finalmente aprendí sobre el campo y un día me dijo "como no me va a subir la moral hija si mire todo lo que sabe hacer ya". Gracias a mi papi ahora

se muchísimas cosas, se trabajar. Terminábamos siempre muy cansados del trabajo, así que decíamos que ganas de un fresco bien helado, y bajábamos a tomar juntos una coca cola bien helada.

Tengo el maravilloso don de ser una persona servicial, honrada, trabajadora, luchadora y muy humana y puedo dar certeza que cada una de ellas es gracias a todo lo que vi reflejado en mi papá. Desde chiquita lo he admirado mucho, admiro el hombre tan trabajador y entregado que es, admiro su perseverancia y su lucha constante. Siempre ha buscado salir adelante, mis memorias son de un hombre luchador, trabajador, madrugador que siempre buscaba trabajar y darnos un gran ejemplo. Desde pequeño siempre busco ser alguien, siempre lucho por estudiar, por salir adelante, por superarse. Siempre le dije, papi algún día yo voy a superar todo lo que usted es y él me decía que ese sería su sueño ver a sus hijos ser más de lo que él es. Soy estudiante de la carrera de medicina y me esfuerzo mucho para tener las mejores notas y cada logro que tengo en mi vida todos son para él, gracias a todos sus impulsos.

Siempre he pensando que todos merecen tener un papá como él que yo tengo y siento mucho dolor cuando escucho historias de niños que no tuvieron la oportunidad de tener un papá como él mío. Amo a mi papá con toda mi conciencia, con todo mi respeto, con toda mis ganas de aferrarme a la vida, porque decir que lo amo con el corazón sería muy poco. Mi papá es el mayor amor que yo tengo, es la persona por la que día a día quiero luchar y salir adelante. Mi papá es el motor de mi vida. Y si es que existen muchas vidas más, yo voy a buscar a mi papá en todas las que existentan porque me niego a no tenerlo conmigo.

Mi papi siempre buscaba formas para ayudar a todo el que podía y sus hijos somos el reflejo de todo lo que hemos visto de él. Un hombre bueno, honrado y trabajador. Me siento orgullosa de llamarlo papá y de saber que él eligió tenerme y decir que soy su hija, su pequeña de papá.

Desde que tengo conciencia me he dado cuenta el amor tan grande que tengo hacia mi papá, de la magnitud de persona que él es para mi vida. Muchas personas lo conocen pero muy pocos saben que es un papá admirable, que es un hombre que ha luchado incansablemente porque sus hijos para que tengan un futuro. Mi papá es el amor de mi vida, es el héroe de cada una de mis historias.

Mi papá me enseñó a estudiar, a trabajar, a montar caballo, a ser disciplinada, educada, soñadora.

Quiero concluir una pequeña parte de mi historia, pidiendo ser escuchada.... Para muchas personas esta podría ser una carta más, pero para mi aquí va plasmada parte de mi historia, una historia que refleja el amor que un papá supo dar.

De pequeña no dormía hasta que mi papi llegaba a casa y esperaba en la puerta no importaba la hora, no importaba el frío, no importaba el tiempo.... Desde que papi salió, toda mi vida cambio y se desordenó un poco, pero papi yo estoy en la misma puerta esperándolo llegar de nuevo y no me

voy a cansar de esperarlo, jamás cerraré esta puerta y mi corazón estará completo nuevamente hasta que pueda usted regresar de nuevo.

Oro cada día de mi vida por verlo de nuevo, por trabajar de nuevo, por tomarnos la coca cola helada de nuevo, oro para que volvamos a ser mi papi y yo para toda la vida. Yo gane con el papá que Dios me regalo y voy a esperarlo así sea el último respiro de mi vida.

Por tanto, os digo que todo lo que pidieréis orando, creed que lo recibiréis, y os vendrá.

Marcos 11:24

cel

Le saluda respetuosamente.

Andrea Rachell Martínez Aguilar

Honorable Lewis A. Kaplan
United States Courthouse
Southern District of New York 500 Pearl St.
New York, NY 10007-1312

United States v. Martínez Turcios. 1:18-cr-00499 (LAK)

Dear Judge Kaplan,

My name is Andrea Rachell Martínez Aguilar. I am addressing you, honorable judge, with all respect to ask to be heard and for you to know a little about my dad's life, reflected in my story.

I want to tell you the story of my dad, as reflected in what he is to me - the prince charming of my fairy tale. Going back to my memories of the past, I have very well understood the love that I received from my dad. As a child, I slept with his shirts because they were loose on me, and they were very soft. Dad always said, "Daughter, I ran out of shirts," but he ended up saying... "You're daddy's little girl."

My dad sometimes came home late from work. He drove trucks, and I couldn't sleep until he arrived. It didn't matter how many days it was or the hour; his princess always waited at that door for her dad. Finally, Dad arrived. I would ask him if we could play... to which he would respond, "Yes, my baby." It happens that I have always liked cooking a lot; he would put a chair in front of the stove and Mom's pots. While I prepared a delicious imaginary soup, Dad would tell me, "Only 30 minutes, daughter," but he ended up agreeing 5 minutes more, which for me today has been the five golden minutes for the rest of my life.

One day, my sister and I came up with the idea that we wanted a doll of our size. By then, we had never seen one. Dad did the impossible until he managed to get us the doll of our dreams.

I had a hard time sleeping alone because I had many nightmares but, above all, because I felt that I was too small not to be with Dad, so every night I waited until it would be late. I would quietly go wake up Dad to be able to tell him, "Dad, can I sleep with you?" I always remember that I would scare him immensely, but he would say, "Yes, daughter, lie down here with me." I am going to tell my secret: I would pee, wake up, and tell my dad... "Dad, I peed," and he would say, "It doesn't matter, daughter." He would change me, put towels, and we would lie down again. My mom would say they don't care to sleep with wet ribs. But the truth is that no, as long as I had my safe place and someone to sleep with.

We traveled a lot and always went as a family. I remember we always fought over who ate next to Dad or who held his hand... Over the years, it is the only hand I never want to let go of for the rest of my life.

Dad always worked hard to give us all the toys we wanted, to take us to nice places, to be a present dad, for giving us love, for teaching us to be polite, responsible, and intelligent. He was always number one in everything, so since we were little, he encouraged everyone to always be the best and give their best.

When I finally grew up, already in school, Dad always supervised our grades. He scolded us, when necessary, but he always helped us and showed us many study methods to achieve our goals. He always encouraged us to achieve our dreams and motivated us to be number one.

I reached my teenage years, where dad no longer gave permission to go out, I got very angry and cried but he said, "Daughter, it is very dangerous." Today, I am grateful for that because, thanks to him, to his decisions and care, I am the woman I am, thanks to him and what he has taught me.

My dad decided to name me Rachell, but at school they made fun of me for it. Crying, I said "Daddy, change my name." He would say yes, but he ended up telling me, "Daughter, your name is beautiful. I

named you after the presenter Rashel Díaz, so you have to be proud of your name," until I finally understood it and started to love my name.

For Father's Day events at my school, Dad was always present, playing, eating. He was always a present dad. At home, we prepared a surprise for him and decorated his office with many balloons and many letters, where we told him how much we loved him and admired him.

Every birthday of Dad's, we try to be the best children and make him very happy.

Every Children's Day, the gift from Dad could not be missing; even as adults, he never stopped giving us our gift. This year, 2024, has been the first year that I have not received a gift on Children's Day from my dad, and it is a harsh blow of reality, but I have hope that there will be more Children's Days and that the gift will return.

Dad also taught me to be a fighter, to understand that things are earned by working, striving to get ahead, so one day I decided to ask him for a job, and he gave me one. So, every day at 5 in the morning, we went out to work in the field. I was a very sheltered girl who didn't know how to do many things, so my dad taught me to work from scratch, from things as simple as picking up trash, looking for order, finding stability in everything. He taught me to milk cows, to give them medicine, to know the doses of the medicine. He taught me to cut grass, to carry palm, to plant fruits, trees, and food. Finally, I learned how to do field work, and one day he told me, "How can you not lift my spirits, daughter? Just look at everything you already know how to do." Thanks to my dad, I now know so many things. I know how to work.

We always ended up very tired from work, so we said we wanted a cold, chilled drink, and we would go down to have a nice cold Coca-Cola together.

I have the wonderful gift of being a helpful, honest, hardworking, fighter, and very human, and I can assure you that each one of them is thanks to everything I saw reflected in my dad. Since I was little, I have admired him a lot; I admire the hardworking and dedicated man he is. I admire his perseverance and constant struggle. He has always sought to get ahead; my memories are of a fighting man, a hard worker, and an early riser who always sought to work and give us a great example. Since I was little, he always sought to be someone, always fighting to study, to get ahead, to improve. I always told him, Dad, one day I will surpass everything you are, and he would tell me that his dream would be to see his children be more than he is. I am a medical student, and I strive hard to have the best grades. Every achievement I have in my life is all because of him, thanks to all his encouragement.

I have always thought that everyone deserves to have a dad like mine, and I feel a lot of pain when I hear stories of children who did not have the opportunity to have a dad like mine. I love my dad with all that I am, with all my respect, and with all my desire to cling to life, because saying that I love him with all my heart would be an understatement. My dad is the greatest love that I have; he is the person for whom I want to fight and get ahead every day. My dad is the driving force behind my life. And if there are many more lives, I will seek my dad in all that exists because I refuse to not have him with me.

My dad always looked for ways to help everyone he could, and his children are the reflection of everything we have seen in him—a good, honest, and hardworking man. I feel proud to call him 'dad' and to know that he chose to have me, and to say that I am his daughter, his little girl.

Since I became aware, I have realized the great love I have for my dad, of the magnitude of the person he is in my life. Many people know him, but very few know that he is an admirable dad, a man who has fought tirelessly for his children to have a future. My dad is the love of my life; he is the hero of each one of my stories.

My dad taught me to study, to work, to ride a horse, to be disciplined, to be polite, and be a dreamer.

I want to conclude a small part of my story, asking to be heard... For many people, this could be just another letter, but for me, it is part of my story—a story that reflects the love a dad knew how to give.

As a child, I wouldn't sleep until my dad got home, and I would wait at the door no matter the hour; it didn't matter the cold, it didn't matter the weather... Since Dad left, my whole life has changed and become a little disordered, but Dad, I am still at the same door, waiting for you to arrive again. I will not tire of waiting for you; I will never close this door, and my heart will be whole again when you return.

I pray every day of my life to see him again, to work again, to have a chilled Coca-Cola together again. I pray that my dad and I can be together for life. I was lucky to have the dad that God gave me, and I will wait for him even if it is to the last breath of my life.

“Therefore, I say to you, whatever you ask in prayer, believe that you will receive it, and it will come to you.” - Mark 11:24

I greet you respectfully,

Andrea Rachell Martínez Aguilar

HONORABLE LEWIS A. KAPLAN
UNITED STATES COURTHOUSE
Southern District of New York
500 Pearl St.
New York, NY 10007-1312
Referente a: United States v. Martinez Turcios, 1:18-cr-00499 (LAK)

Estimado Juez Kaplan.

Mi nombre es Eduardo José Martínez Aguilar El segundo de los tres hijos varones del Señor Midence Martínez Turcios me dirijo hacia usted con mucho respeto para darle a conocer un poco más sobre mi padre y sobre lo que él ha sido como persona, tengo muy bonitos recuerdos de mi niñez desde que vivíamos en la ciudad de Tegucigalpa y luego nos fuimos a vivir a Colón, el lugar donde es mi papá, la familia de mi papá es muy numerosa y recuerdo que en las reuniones familiares mi papá siempre era muy respetado por su carisma y su buena atención hacia todas las personas. Mi papá es un hombre muy trabajador, siempre trataba de enseñarnos el trabajo para que supiéramos el valor del dinero y lo que costaba hacerlo, siempre me enseñó buenos valores desde pequeño me enseñó a orar y cómo tener conversación con Dios, mi papá es una persona diría yo que exageradamente estudiosa, es un hombre muy inteligente, el cual admiro mucho su mayor deseo ha sido que seamos personas de bien que demostramos el cariño hacia las personas así como él ha sido que siempre andaba buscando la manera de ayudar a los demás. Tengo muchos recuerdos de mi niñez de cuando me enseñó a nadar, de cuando me regaló mi primera bicicleta, él siempre me trataba de dar mucha felicidad, mi papá era una persona muy querida en nuestra comunidad, él siempre ayudaba a las personas, por ejemplo las madres ya sabían que el día de las madres mi papá le daba regalos, el Día del Niño regalaba piñatas y dulces en la comunidad de Zamora, también hizo el alumbrado de más de 2 km de carretera, ayudo a alumbrar muchos campos de fútbol y así hizo obras por todo el departamento de Colón, este proceso que estamos pasando como familia ha sido muy duro, nos ha afectado emocionalmente por no tener a nuestro padre con nosotros, mis hermanas se han visto afectadas en sus estudios. Pero confío en Dios en que todo saldrá bien, le pido a Dios por usted señor juez que lo ayude a tomar la mejor decisión sobre mi papá, le saludo respetuosamente estimado juez kaplan Gracias De antemano por tomar en cuenta los pensamientos y recuerdos de mi persona para mi padre, confío plenamente en que todo saldrá bien,

Confía en Dios de todo corazón y no en tu propia inteligencia reconócelo en todos los caminos y él hallará tu Senda proverbios 35 6
le suplico su ayuda

Atentamente

Eduardo José Martínez Aguilar

HONORABLE LEWIS A. KAPLAN
UNITED STATES COURTHOUSE
Southern District of New York
500 Pearl St.
New York, NY 10007-1312

Regarding: United States v. Martínez Turcios, 1:18-cr-00499 (LAK)

Dear Judge Kaplan.

My name is Eduardo José Martínez Aguilar, the second of three sons of Mr. Midence Martínez Turcios. I am addressing you most respectfully to share a little more about my father and about what he has been like as a person. I have very nice memories of my childhood since we lived in the city of Tegucigalpa and then we moved to Colón, the place where my dad is from. My dad's family is very large and I remember that at family gatherings, my dad was always very respected for his charisma and his good attention to all people. My dad is a very hardworking man; he always tried to teach us to work hard so that we would know the value of money and what it cost to earn it. He always taught me good values from a young age, he taught me to pray and how to have a conversation with God. My dad is a person I would say is excessively studious, he is a very intelligent man, whom I admire a lot; his greatest desire has been for us to be upright people who show affection towards others just as he has been, always looking for ways to help others. I have many memories from my childhood of when he taught me to swim, of when he gave me my first bicycle, and he always tried to bring me a lot of happiness. My dad was a very beloved person in our community. He always helped people; for example, mothers already knew that on Mother's Day, my dad would give gifts, on Children's Day he would give piñatas and candies in the Zamora community, he also did the lighting of more than 2 km of road, helped light many soccer fields and this way did works throughout the sector of Colón. This ordeal we are going through as a family has been very hard, it has affected us emotionally not having our father with us, my sisters have been affected in their studies. But I trust in God that everything will turn out well, I pray to God for you, Your Honor, that He help you make the best decision about my dad. I respectfully greet you, Your Honor Kaplan. Thank you in advance for considering my thoughts and memories of my father. I fully trust that everything will turn out well.

“Trust in God with all your heart and not in your own understanding, acknowledge him in all your ways and he will make your paths straight.” - Proverbs 3:5-6. I beg for your help.

Sincerely,

Eduardo José Martínez Aguilar

HONORABLE LEWIS A. KAPLAN
UNITED STATES COURTHOUSE
Southern District of New York
500 Pearl St.

New York, NY 10007-1312

Referente a: United States v. Martinez Turcios, 1:18-cr-00499 (LAK)

Estimado juez Kaplan

Es un honor saludarle, Mi nombre es Josué Midence Martínez Turcios y soy el hijo menor del Señor Martínez, Yo le voy a hablar de lo que es mi papá, señor juez mi papá para mí es el mejor regalo que me pudo haber dado Dios, mi papá ha sido lo mejor, ha sido un papá que siempre nos ha protegido, siempre ha estado presente en los momentos más importantes de mi vida, ha sido quien me ha cumplido cada uno de mis sueños, él nunca me dijo que no por más difícil que estuvieran las cosas. Él es quien hace todo para que yo esté bien. Él es quien me ayudó a vencer todos mis miedos, él me ha enseñado a ser un hombre trabajador y me ha enseñado a luchar por mis sueños, a lograr todo lo que me propongo, a nunca rendirme, le doy gracias a Dios porque tengo un papá que siempre estuvo, mi papá me llevó a mi primer día de kínder el cual para mí era un gran miedo pero ahí estaba él siempre, mi papá para mí era mi superhéroe, él hacía que el miedo que yo sentía se convirtiera en paz, porque él siempre estaba ahí para cuidarme, las cosas que mi papá hacía son cosas que no cualquier papá las hace, siempre tenía tiempo para mí, me llevaba a el kínder y se quedaba ahí todo el día a esperar que yo terminara todas mis clases, él se quedaba fuera del aula sentado en una silla leyendo el periódico, mientras yo terminaba las clases, para que yo no tuviera miedo, él siempre que salíamos de clases me llevaba a comer papitas con salsa, que era mi premio por portarme bien, gracias a mi papá tengo recuerdos únicos, que hicieron que tuviera la mejor infancia. Él me compró mi primer bicicleta de Rayo McQueen y me enseñó a andar en bicicleta, tengo el bonito recuerdo que me llevaba el kínder en bicicleta y me iba ahí enseñando para que no me golpeará, recuerdo que siempre que él salía de viaje a trabajar que se iba a transportar cemento en una rastra, él siempre me traía mi juguete favorito, él siempre me hacía grandes sorpresas, él llegaba y me despertaba y cuando yo abría los ojos lo primero que miraba eran mis juguetes y a él y junto los habríamos y jugábamos juntos, mi papá me enseñó a jugar mi juego favorito que es el fútbol, él y yo despertábamos todos los domingos y nos íbamos a jugar y despertábamos a todos en la casa, mi papá me llevó por primera vez a una cancha de fútbol y estuvo ahí en todo momento dándome instrucciones de cómo jugar y siempre estuvo conmigo en cada entrenamiento, mi papá me enseñó a montar a caballo lo que siempre me había gustado, él me enseñó a trabajar con el ganado, él me enseñó a tener amor por los animales porque él tiene un gran corazón, tiene amor por los animales, mi papá ha sido lo mejor mi mayor felicidad, cuando las vacas parían y mirábamos los terneros recuerdo que yo tenía dos vacas favoritas que estaban embarazadas, pero yo me enfermé de covid y él sin importar que se podía contagiar él llegó y me llevó a los

terneritos hasta la casa, solo para hacerme feliz y que yo los viera, señor juez si yo pudiera contarle todo lo que es mi papá, el mejor del mundo, yo le haría un libro de mil páginas, respetuosamente señor y le suplico me regresé a mi papá.

Atentamente

JOSUE MIDENCE MARTINEZ TURCIOS

CELULAR



HONORABLE LEWIS A. KAPLAN
UNITED STATES COURTHOUSE
Southern District of New York
500 Pearl St.
New York, NY 10007-1312

Regarding: United States v. Martínez Turcios, 1:18-cr-00499 (LAK)

Dear Judge Kaplan,

It is an honor to greet you. My name is Josué Midence Martínez Turcios, and I am the youngest son of Mr. Martínez. I am going to talk to you about what my dad is, Your Honor: my dad is the best gift God could have given me, my dad has been the best, he has been a dad who has always protected us, he has always been present in the most important moments of my life, he has been the one who has fulfilled each of my dreams, he never told me no, no matter how difficult things were. He is the one who does everything so that I am well. He is the one who helped me overcome all my fears. He has taught me to be a hardworking man and has taught me to fight for my dreams, to achieve everything I set out to do, and to never give up. I thank God because I have a dad who was always there for me. My dad took me to my first day of kindergarten, which was very scary for me, but he was always there. My dad was my superhero; he made the fear I felt turn into peace because he was always there to take care of me. The things my dad did are things that not every dad does; he always had time for me, he took me to the kindergarten, and stayed there all day waiting for me to finish all my classes. He would stay outside the classroom, sitting in a chair reading the newspaper, while I finished classes, so that I wouldn't be afraid. When we left class, he would take me to eat fries with salsa, which was my reward for behaving well. Thanks to my dad, I have unique memories that made my childhood the best. He bought me my first Rayo McQueen bicycle and taught me to ride a bike, I have the nice memory that he would take me to kindergarten on a bike and he would teach me there so I wouldn't fall. I remember that whenever he went on a work trip to transport cement in a truck, he always brought me my favorite toy. He would always give me great surprises. He would arrive and wake me up, and when I opened my eyes, the first thing I saw was my toys and him, and we would open them together, and we would play together. My dad taught me to play my favorite game, which is soccer. He and I would wake up every Sunday and go play, and wake everyone up in the house. My dad took me for the first time to a soccer field and was there at all times, giving me instructions on how to play, and was always with me at every training. My dad taught me to ride horses, which I had always enjoyed. He also taught me to work with cattle and to have a love for animals, as he has a big heart and a genuine affection for them. My dad has been the best, my greatest happiness. When the cows calved and we watched the calves, I remember that I had two favorite cows that were pregnant, but I got sick with COVID-19, and he, regardless of the risk of getting infected, came and took the little calves to the house, just to make me happy and for me to see them. Your Honor, if I could tell you everything about my dad, the best in the world, I could make a thousand-page book. Respectfully, sir, I beg you to return my dad to me.

Sincerely,

JOSUE MIDENCE MARTINEZ TURCIOS
CELL PHONE

**HONORABLE LEWIS A. KAPLAN
UNITED STATES COURTHOUSE
Southern District of New York
500 Pearl St.**

New York, NY 10007-1312

Referente a: United States v. Martinez Turcios, 1:18-cr-00499 (LAK)

Estimado juez kaplan los saludo muy respetuosamente el motivo de la presente es para hablarle sobre mi convivencia con mi hermano Midence Oquely Martínez Turcios, Mi nombre es Sandra Ivette Martínez Turcios, mi hermano es el mayor de 15 hermanos, yo lo he respetado porque así nos enseñaron y porque él se ganó nuestro respeto, nuestros padres nos inculcaron tener humildad, amor, responsabilidades y lo más importante siempre nos educaron con temor a Dios, por eso mi hermano Siempre lo admiré él fue un hermano muy cariñoso, consejero, era tan estudioso, humilde y muy noble con los ancianos, siempre él buscaba la manera de cómo hacer sentir bien a las personas, es muy paciente, nunca le dio un problema a nuestros padres, siempre él como el mayor de los hermanos me aconsejaba que estudiara y que respetáramos a nuestros padres, es un hombre muy pero muy trabajador y nosotros como hermanos, hijos, madre lo extrañamos mucho. Recuerdo cuando estudiaba en la capital era por bastante tiempo y cuando le daban sus vacaciones mi madre siempre le preparaba sus comidas favoritas y todos nosotros alegres porque venía mi hermano de la Universidad, de la academia militar, señor juez kaplan le pido con el corazón en la mano, con humildad que mi Dios me ha dado y con el respeto que usted se merece cuando usted lea esta carta tome en cuenta lo que le estoy escribiendo sobre mi hermano. Él es un excelente persona, él ha sido muy lindo con todas nosotras y el pueblo también lo quiere por su humildad, lo extrañamos, mi madre clama a Dios para volver a verlo ya que ella se encuentra en una silla de ruedas, porque hace 3 años [REDACTED] ella tiene 80 años de vida y como toda madre tiene miedo de morir sin ver a su hijo, amamos a nuestro hermano Lo extrañamos esperamos en Dios que todo se haga conforme a su voluntad, me despido de usted suplicándole su misericordia señor kapla.

Proverbios 33:1 nunca se aparte de ti la misericordia la verdad Atala a tu cuello escribe en la tabla de tu corazón y hallarás gracia y buena opinión ante los ojos de Dios y de los hombres

Atentamente Sandra Ivette Martínez Turcios
[REDACTED]

HONORABLE LEWIS A. KAPLAN
UNITED STATES COURTHOUSE
Southern District of New York
500 Pearl St.
New York, NY 10007-1312

Regarding: United States v. Martínez Turcios, 1:18-cr-00499 (LAK)

Dear Judge Kaplan,

I greet you very respectfully. The reason for this letter is to speak to you about my relationship with my brother, Midence Oquely Martínez Turcios. My name is Sandra Ivette Martínez Turcios. My brother is the oldest of 15 siblings. I have respected him because that is how we were taught and because he earned our respect. Our parents instilled in us to have humility, love, to be responsible, and, most importantly, they always educated us with fear of God. That is why I always admired my brother; he was a very affectionate brother, a guide, he was so studious, humble, and very noble with the elderly, he always looked for ways to make people feel good, he was very patient, he never gave our parents a problem. He, as the oldest of the siblings, always advised me to study and to respect our parents. He is a very, very hardworking man, and we, as siblings, children, and mother, miss him very much. I remember when he studied in the capital; it was for quite some time. When he had his vacation, my mother always prepared his favorite meals, and all of us were happy because my brother was coming from the University, from the military academy. Your Honor, Judge Kaplan, I ask you with my heart in my hand, with the humility that my God has given me, and with the respect you deserve when you read this letter, please take into account what I am writing to you about my brother. He is an excellent person; he has been very kind to all of us, and the people also love him for his humility. We miss him, my mother cries out to God to see him again since she is in a wheelchair, because three years ago [REDACTED], she is 80 years old, and like any mother, she is afraid of dying without seeing her son. We love our brother. We miss him, we hope in God that everything is done according to His will. I bid farewell to you, begging for your mercy, Judge Kaplan.

Proverbs 33:1 - "Never let mercy and truth depart from you, bind them around your neck, write them on the tablet of your heart, and you will find favor and good understanding in the eyes of God and man."

Sincerely,

Sandra Ivette Martínez Turcios
[REDACTED]

HONORABLE LEWIS A. KAPLAN
UNITED STATES COURTHOUSE
Southern District of New York
500 Pearl St.
New York, NY 10007-1312
Referente a: United States v. Martinez Turcios, 1:18-cr-00499
(LAK)

Estimado juez Kaplan, es un placer saludarle deseo éxitos y bendiciones en sus labores diarias. Soy la hermana del Señor Martínez Turcios. Mi nombre es Claudia Mariela Martínez Turcios, señor juez que mi hermano mayor es una gran persona, él es muy especial en nuestra vida y en mi familia lo extrañamos y le pido a Dios que pronto esté al lado de nuestra familia. Él es un hermano humilde, cariñoso, un hermano con sabiduría que después de que murió nuestro papá, José Martínez, mi hermano Mldence es el que siempre estuvo ahí para cuidar de nuestra madre y de nosotras sus hermanas, nunca nos dejó de la mano, lo extrañamos y tengo fe en el altísimo que pronto estará aquí con nosotros lo extrañamos mucho, Dios lo guarde y le proteja siempre,, amamos a mi hermano y le pedimos que nos ayude a que él vuelva pronto.

bendiciones

Claudia Mariela Martínez Turcios

HONORABLE LEWIS A. KAPLAN
UNITED STATES COURTHOUSE
Southern District of New York
500 Pearl St.
New York, NY 10007-1312

Regarding: United States v. Martínez Turcios, 1:18-cr-00499 (LAK)

Dear Judge Kaplan,

It is a pleasure to greet you. I wish you success and blessings in your daily work. I am the sister of Mr. Martínez Turcios. My name is Claudia Mariela Martinez Turcios. Your Honor, my older brother is a great person; he is very special in our lives, and in my family, we miss him, and I ask God that he may soon be by our family's side. He is a humble, loving brother with wisdom, who, after our father, José Martínez, passed away, my brother Midence is the one who was always there to take care of our mother and of us, his sisters. He never abandoned us; we miss him, and I have faith in the Most High that he will soon be here with us. We miss him a lot; may God keep and protect him always. We love my brother, and we ask you to help us bring him back soon.

Blessings,

Claudia Mariela Martínez Turcios

Zamora, Tocoa Colón Honduras

**HONORABLE LEWIS A. KAPLAN
UNITED STATES COURTHOUSE**

Southern District of New York

500 Pearl St.

New York, NY 10007-1312

Referente a: United States v. Martinez Turcios, 1:18-cr-00499 (LAK)

Honorable juez Dios bendiga grandemente su vida y deseo éxitos y bendiciones en sus labores diarias, hoy quiero expresarle Señor Juez mi agradecimiento hacia mi hermano por el ser maravilloso que es mi Amado hermano Midence, su presencia en mi vida es una fuente constante de alegría apoyo y comprensión, le doy gracias a Dios por su amor incondicional, su paciencia y su capacidad para hacerme sonreír siempre la hermandad es un regalo de Dios que valoro más allá de las palabras, le doy gracias a Dios por mi hermano que es un regalo de Dios que valoró, como hermana que soy Gracias por ser un hermano leal, por sus palabras de aliento y por los memorables momentos que hemos compartido, cada risa, cada consejo, cada gesto de cariño fortalece el lazo de nuestra hermandad. Quiero expresarle que mi hermano es una parte esencial de mi vida, su bondad y su empatía es incansable apoyo, son Pilares que me sostienen en los días difíciles, gracias a nuestro Dios por ser un hermano excepcional y por enriquecer mi vida con su presencia maravillosa, tengo mucha fe en nuestro Dios Todopoderoso que él pueda estar con nosotros, mi hermano con la ayuda de Dios Y usted volverán señor juez, estaremos nuevamente juntos para poder estar en familia alabando y glorificando a nuestro Dios Todopoderoso por el milagro de él regresar. extrañamos mucho a mi querido hermano. Para mí es muy especial, es un hermano comprensivo, compasivo y misericordioso lo amo con todo mi corazón y deseo que Dios conceda esta petición, por favor permítanos que él vuelva pronto amamos mucho y lo extrañamos con todo nuestros corazón

Un saludo cordial y bendiciones A su vida Señor Juez

Dania Martinez Turcios

Zamora, Tocoa Colón Honduras

**HONORABLE LEWIS A. KAPLAN
UNITED STATES COURTHOUSE
Southern District of New York
500 Pearl St.
New York, NY 10007-1312**

Regarding: United States v. Martínez Turcios, 1:18-cr-00499 (LAK)

Honorable Judge,

May God greatly bless your life, and I wish you success and blessings in your daily work. Today I want to express to you, Your Honor, my gratitude towards my brother for being the wonderful person that my beloved brother Midence is. His presence in my life is a constant source of joy, support, and understanding. I thank God for his unconditional love, his patience and his ability to always make me smile; brotherhood is a gift from God that I value beyond words. I thank God for my brother who is a gift from God that I value. As a sister, I am grateful for him being a loyal brother, for his words of encouragement and for the memorable moments we have shared, every laugh, every piece of advice, every gesture of affection strengthens the bond of our brotherhood. I want to express to you that my brother is an essential part of my life; his kindness, his empathy, and support were tireless. They are pillars that hold me up on difficult days, thanks be to our God for him being an exceptional brother and for enriching my life with his wonderful presence. I have great faith in our Almighty God that my brother may be with us again; with God's help and yours, he will return, Your Honor, we will be together again to be with family praising and glorifying our Almighty God for the miracle of his return. We miss my dear brother very much. He is very special to me, he is an understanding, compassionate, and merciful brother, I love him with all my heart and I wish that God grants this request, please allow him to return soon, we love him very much and we miss him with all our heart.

A cordial greeting and blessings to your life, Your Honor.

Dania Martínez Turcios

TOCOA COLÓN, 20 MAYO 2025

HONORABLE LEWIS A. KAPLAN
UNITED STATES COURTHOUSE

Southern District of New York
500 Pearl St.

New York, NY 10007-1312

Referente a: United States v. Martinez Turcios, 1:18-cr-00499 (LAK)

Estimado Juez Kaplan:

Buenas tardes estimado juez, me dirijo a usted con más profundo respeto, con la intención de ofrecer mi testimonio en apoyo a mi querido sobrino Midence o que di Martínez a quien conozco desde que nació en aldea de Zamora, yo soy María Cleofes Lisser, soy hermana del padre de Midence Martínez, Midence desde niño fue muy humilde y trabajador siempre trabajó junto a su padre en todo lo que hacían en el campo, desde ordeñar vacas, cortar Palma, sembrar maíz y muchas otras actividades, siempre fue un niño respetuoso y amable alrededor de sus 10 años vivió en mi casa en Tocoa Colón, mientras estudiaba porque en la aldea Zamora no había una buena escuela y ese tiempo que lo tuve viviendo en mi casa me demostró ser un muchacho honesto respetuoso y muy estudioso, nunca se portó mal y siempre pendiente de ayudarme en la casa, al crecer se convirtió en un hombre con cualidades excepcionales, dedicado a su familia y es muy amoroso, mi sobrino ha sido una persona muy reconocida en la aldea de Zamora, porque ha sido generoso y servicial, recuerdo en un tiempo que mi hermano el padre de él estuvo enojado conmigo y no teníamos una buena relación y aun así mi sobrino nunca dejó de visitarme y de estar pendiente de mí porque siempre fue alguien que buscaba la paz y que buscaba que todos estuviéramos bien, siempre apoyaré a mi sobrino pase lo que pase, creo que es un buen hombre por lo que le pido su bondad para mi sobrino para que pueda venir y estar con nosotros ya que tanto su madre como yo somos personas de avanzada edad, le pido Con mucho respeto que sea misericordioso la sentencia que le dé a mi sobrino para que sea posible que él vuelva a estar con nosotros, le agradezco su tiempo y su consideración a leer esta carta

Atentamente

Maria Cleofes Lisser

Celular: [REDACTED]

TOCOA COLÓN

MAY 20, 2025

HONORABLE LEWIS A. KAPLAN
UNITED STATES COURTHOUSE
Southern District of New York
500 Pearl St.
New York, NY 10007-1312

Regarding: United States v. Martínez Turcios, 1:18-cr-00499 (LAK)

Dear Judge Kaplan,

Good afternoon, Your Honor, I address you with the deepest respect, with the intention of offering my testimony in support of my dear nephew Midence Oquely Martínez whom I have known since he was born in the village of Zamora. I am María Cleofes Lisser, I am the sister of Midence Martínez's father. Ever since Midence was a child, he was very humble and hardworking. He always worked with his father on everything they did in the field, from milking cows to cutting palm, planting corn, and many other activities. He was always a respectful and kind child. Around the age of 10, he lived in my house in Tocoa Colón, while studying because in the village of Zamora, there wasn't a good school and that time that I had him living in my house, he showed himself to be an honest, respectful boy and very studious, he never misbehaved and was always attentive to help me in the house. As he grew up, he became a man with exceptional qualities, dedicated to his family and very loving. My nephew has been a very recognized person in the village of Zamora, because he has been generous and helpful. I remember a time when my brother, his father, was angry with me, and we did not have a good relationship, and yet my nephew never stopped visiting me and being attentive to me because he was always someone who sought peace and who sought for us all to be well. I will always support my nephew no matter what happens. I believe he is a good man, so I ask for your kindness for my nephew so that he can come and be with us, since both his mother and I are elderly people. I respectfully ask that you be merciful in the sentence you give to my nephew so that it is possible for him to be with us again. I thank you for your time and your consideration in reading this letter.

Sincerely,

María Cleofes Lisser
Cell: [REDACTED]

TOCOA, COLON 14 NOVIEMBRE 2024

HONORABLE LEWIS A. KAPLAN

UNITED STATES COURTHOUSE

Southern District of New York

500 Pearl St.

New York, NY 10007-1312

Referente a: United States v. Martinez Turcios, 1:18-cr-00499 (LAK)

Honorable señor juez soy Leticia trigueros madre de la esposa de Midence Martínez, suegra de Midence, Le agradezco de antemano permitirnos dirigirnos a usted para poder darle a conocer un poco quién es Midence, conocí a Midence hace aproximadamente 25 años desde que yo tenía un naranjal yo cosechaba y compraba naranja y la exportaba al Salvador, cuando en mi propiedad no tenía cultivo yo compraba naranja al padre de Midence, tanto el padre de Midence como es han sido personas respetables, Don Jose el padre de Midence fue un hombre muy trabajador, un hombre honorable, totalmente intachable y Midence sin duda era un reflejo de lo que era su padre, años después en el año 2009 él y mi hija se conocieron por medio de la política, e iniciaron una relación, al principio yo no estaba de acuerdo en esa relación ya que Midence era un político recién separado de la madre sus hijos y tenía temor que no fuera una relación seria, pero al pasar el tiempo él se fue ganando mi admiración, mi respeto y sobre todo mi cariño, admiro mucho su humildad trataba de la misma manera a una persona indigente que a un político de su altura, él servía a los demás como cualquier persona sin importar el cargo que él tuviera, es una persona tan noble, recuerdo que en una ocasión sin que yo me diera cuenta él le ayudó económicamente a una de mis empleadas que necesitaba un dinero para una ambulancia para llevar una niña al hospital a otra ciudad y hasta el día de hoy esa señora vive agradecida pidiendo oración por Midence y la niña que ahora ya tiene 10 años dice que quiere conocer a ese hombre que ayudó a salvarle la vida y ora por él y acciones como esas me hicieron ver el corazón tan noble que él tiene, cuando la relación de él y mi hija ya era más seria él se vino a vivir a mi casa porque ellos todavía no tienen casa propia, pero para mí era una alegría tenerlo aquí porque yo soy una mujer viuda, mis otras hijas están solteras y Midence vino a hacer como la seguridad de mi casa, yo dormía más tranquila porque sabía que había un hombre en la casa, por las tardes a mí me gusta ir al patio de mi casa a asear, a barrer, a limpiar los gallineros y a esa hora él venía llegando de trabajar y entraba a bañarse a ponerse ropa cómoda y salí al patio a ayudarme a hacer todo lo que yo estaba haciendo, aunque el viniera cansado, para las fechas especiales él se preocupaba por aunque sea hacer una comida o algo para compartir en familia. Siempre busco la unión de la familia y el compartir juntos, le encantaba la Navidad y desde los primeros días de diciembre era él quien se encargaba de que armáramos el árbol navideño y decoráramos la casa y no digamos cuando mi hija hacía el pesebre era él quien estaba ahí toda la noche ayudando hasta que ella terminaba, cuando yo tuve [REDACTED] fue un gran apoyo

moral, por eso para nosotros fue un golpe muy duro cuando lo capturaron justo en los días de navidad, fue la navidad más triste que he pasado en los últimos años después de la muerte de mi esposo, llegué a querer a Midence como un hijo y su captura para mí ha sido un proceso muy doloroso, me ha dolido mucho ver a mi hija sufrir, él es un hombre muy querido aquí en el departamento, no sabe cuántas personas nos llaman muy apesaradas por lo que pasó con él, porque la gente no puede creer que un hombre que hizo tanto bien y que no se le conoció por ser una persona de malas acciones esté enfrentando una extradición, él es muy querido la gente habla muy bonito de él y eso nos consuela, son tantas las cosas que pudiera contarle, pero le voy a resumir diciéndole que Midence es un ser humano que no le hacía daño a nadie, era un hombre muy tolerante, que siempre evitaba los problemas. un hombre muy sensato y humilde nunca observé en él ni malos sentimientos, aún cuando habían personas que le habían hecho daño él siempre buscaba la paz y me decía que no había que guardar nada malo en el corazón, Señor Juez sé que el mañana no lo tenemos seguro y que no sabemos cuánto nos queda de vida por lo que yo me atrevo a suplicarle su benevolencia a la hora de dar sentencia Midence, por favor permítanos volver a tenerlo aquí, Su futuro su vida está en las manos de Dios y en las tuyas, Midence ya es un hombre mayor que merece tener una vida tranquila, él ha sufrido mucho a lo largo de la vida, y mas en los últimos años, ha trabajado mucho por favor le suplico permítanos volver a estar juntos, me despido de usted con humildad suplicándole tome en cuenta estas sencillas palabras

Atentamente

Leticia del Carmen Trigueros Perez

Celular [REDACTED]



TOCOA, COLON

NOVEMBER 14, 2024

HONORABLE LEWIS A. KAPLAN
UNITED STATES COURTHOUSE
Southern District of New York
500 Pearl St.
New York, NY 10007-1312

Regarding: United States v. Martínez Turcios, 1:18-cr-00499 (LAK)

Honorable Judge,

I am Leticia Trigueros, mother of Midence Martínez's wife, Midence's mother-in-law. I thank you in advance for allowing us to address you so that we can let you know a little about who Midence is. I met Midence about 25 years ago when I had an orange grove. I harvested and bought oranges and exported them to El Salvador. When on my property I had no crops, I bought oranges from Midence's father; both the father of Midence and he have been respectable people. Don Jose, Midence's father, was a very hardworking man, an honorable man, totally unblemished and Midence was undoubtedly a reflection of what his father was. Years later, in 2009, he and my daughter met through politics, and they started a relationship. At first, I did not agree with that relationship, as Midence was a politician recently separated from the mother of his children and feared that it would not be a serious relationship, but over time he gained my admiration, my respect, and above all my affection. I admire his humility, treating a homeless person the same way as a politician of his stature; he served others like anyone else regardless of the position he held. He is such a noble person; I remember that on one occasion without me realizing it, he helped one of my employees financially who needed money for an ambulance to take a girl to the hospital in another city and to this day that lady lives, grateful, praying for Midence and the girl, who is now 10 years old, says that she wants to meet the man who helped save her life and prays for him and actions like those made me see the noble heart he has. When his relationship with my daughter was already more serious, he came to live in my house because they still do not have their own house, but for me it was a joy to have him here because I am a widowed woman, my other daughters are single and Midence came to act as the security of my house, I slept more peacefully because I knew that there was a man in the house. In the afternoons, I like to go to the backyard of my house to clean, to sweep, to clean the chicken coops and at that time he would come home from work and would go in to shower and put on comfortable clothes and go out to the yard to help me do everything I was doing, even though he came tired. For the special occasions, he would worry about at least making a meal or something to share with family. He always sought family unity and sharing together, he loved Christmas and from the first days of December it was he who made sure we set up the Christmas tree and decorated the house and not to mention when my daughter made the nativity scene, it was he who was there all night helping until she finished. When I had [REDACTED] he was a great moral support, that's why it was a very hard blow for us when he was apprehended right on Christmas Day, it was the saddest Christmas I have spent in recent years after my husband's death. I came to love Midence like a son and his apprehension has been very painful, it has hurt me a lot to see my daughter suffer, he is a very beloved man here in this sector, you don't know how many people call us very sorrowful for what happened to him, because people cannot believe that a man who did so much good and who was not known for being a person of bad actions is facing extradition. He is very loved. People speak very nicely of him and that comforts us. There are so many things I could tell you, but I will summarize by saying that Midence is a human being who didn't harm anyone, he was a very tolerant man, who always avoided problems, a very sensible and humble man, I never observed in him any bad feelings. Even when there were people who had harmed him, he always sought peace and told me that nothing bad should be kept in the heart. Your Honor, I know that tomorrow is not guaranteed and that we do not know how much life we have left, so I dare to plead for you benevolence when sentencing Midence, please allow us to have him here again. His future, his life, is in the hands of God and

in yours. Midence is already an older man who deserves to have a peaceful life, he has suffered a lot throughout life, and more in recent years, he has worked a lot please I beg you to let us be together again, I humbly bid you farewell, begging you to take these simple words into account.

Sincerely,

Leticia del Carmen Trigueros Pérez
Cell phone [REDACTED]

TRANSLATION

HONORABLE LEWIS A. KAPLAN

UNITED STATES COURTHOUSE

Southern District of New York

500 Pearl St.

New York, NY 10007-1312

Referente a: United States v. Martinez Turcios, 1:18-cr-00499 (LAK)

Estimado Señor Juez

por medio de esta carta nos dirigimos a usted la familia Miranda Matute, conformada por mi padre Olvin Miranda que es hermano de la esposa de Midence, o sea es cuñado de mi tío Midence, mi madre Mayra Matute, mi persona Gissell Miranda sobrina política de Midence y mi hermano Olvin Miranda, escribimos esta carta como familia ya que mi tío Midence compartió mucho con nosotros, él Cada vez que tenía un tiempo venía a cenar a nuestra casa o a comer panqueques por las tardes, porque a él le gustaban los panqueques que mi madre hace, yo soy Gissell Miranda tengo 21 años yo tenía 18 años cuando capturaron a mi tío y fue lo más triste que me ha pasado, nos ha dolido mucho porque él se ganó nuestro amor, nuestro cariño, queremos contarle que él ha sido un gran ser humano un gran tío, el cual se ganó nuestra admiración por ser un hombre muy hogareño, dedicado a su familia y a nosotros a su familia política, él siempre mostró que su prioridad a pesar del proceso que estaba viviendo era compartir en familia y pasar bonitos momentos, tuvimos la oportunidad de compartir de cerca con él mucho tiempo y a pesar de que a veces estaba preocupado o triste, el siempre mostraba su mejor cara y nos sacaba una sonrisa, es un hombre que nos enseñó a que debíamos ser disciplinados para salir adelante en la vida, nos aconsejaba que teníamos que trabajar y estudiar que siempre teníamos que esforzarnos y dar lo mejor de nosotros, cada vez que tenía la oportunidad hablábamos mucho y siempre estaba aconsejándonos a mi hermano y a mí, es un hombre muy inteligente, con mucha sabiduría, tiene un carácter fuerte que lo ha ayudado a enfrentar todos los procesos de la vida y tiene algo muy especial que tiene una gran delicadeza para expresar sus ideas, sin imponer nada. Él Escoge muy bien las palabras adecuadas y genera en uno confianza y bienestar, mi tío es una persona tan especial que llegó a ganarse mi confianza que yo con él hablaba de temas que no hablaba ni con mis padres y él siempre me aconsejaba de la mejor manera y no sabe cuánto lo extraño, cuánto lo necesito, él está consciente de que ir a la cárcel es algo bueno para su vida porque podrá rendir cuentas y poder salir de ahí a tener una mejor vida con nosotros. Esperamos señor juez pronto nos permita volver a disfrutar a mi tío, yo se lo pido con todo mi corazón denos la oportunidad de volver a tenerlo aquí, Muchas gracias Dios me lo bendiga

Atentamente

Gissell Alejandra Miranda Matute

Cel. [REDACTED]



HONORABLE LEWIS A. KAPLAN
UNITED STATES COURTHOUSE
Southern District of New York
500 Pearl St.
New York, NY 10007-1312

Regarding: United States v. Martínez Turcios, 1:18-cr-00499 (LAK)

Dear Judge,

Through this letter we address you, the Miranda Matute family, composed of my father Olvin Miranda, who is the brother of the wife of Midence, that is, he is the brother-in-law of my uncle Midence, my mother Mayra Matute, my brother Olvin Miranda, myself Giselle Miranda, niece by marriage of Midence, and my brother Olvin Miranda. We write this letter as a family since my uncle Midence spent a lot of time with us; every time he had time, he would come to dinner at our house or to eat pancakes in the afternoons, because he liked the pancakes my mother makes. I am Giselle Miranda, I am 21 years old, I was 18 years old when they apprehended my uncle, and it was the saddest thing that has happened to me. It has hurt us a lot because he earned our love and our affection, we want to tell you that he has been a great human being, a great uncle, who earned our admiration for being a very home-loving man, dedicated to his family and to us, his in-laws; he always showed that his priority despite the ordeal he was going through was to be with family and spend beautiful moments together. We had the opportunity to get close to him for a long time and even though he was sometimes worried or sad, he always showed his best face and brought us a smile. He is a man who taught us that we should be disciplined to get ahead in life, he advised that we had to work and study that we always had to strive and give our best. Every time he had the opportunity, we talked a lot and he was always advising my brother and me, he is a very intelligent man, with a lot of wisdom, he has firm convictions that have helped him face all the challenges of life and he has something very special, he is very articulate to express his ideas, without imposing anything. He chooses the right words very well and generates trust and well-being, my uncle is such a special person that he earned my trust, so much so that I talked to him about subjects I didn't discuss even with my parents and he always advised me in the best way and he doesn't know how much I miss him, how much I need him. He is aware that going to jail is something good for his life because he will be able to account for himself and be able to get out of there to have a better life with us. We hope, Your Honor, that these expressed lines have some value for you and soon allow us to enjoy my uncle again, I ask you with all my heart to give us the opportunity to have him back here. Thank you very much, God bless you.

Sincerely,

Gissell Alejandra Miranda Matute
Cell. [REDACTED]

Tocoa Colon, Honduras C.A. 25 DE MAYO DEL 2025
HONORABLE LEWIS A. KAPLAN
UNITED STATES COURTHOUSE
Southern District of New York
500 Pearl St.
New York, NY 10007-1312
Referente a: *United States v. Martinez Turcios,*
1:18-cr-00499 (LAK)

Estimado Juez Kaplan:

Yo Oscar Funes Lisser, Mayor de edad con RTN# 02011991001292 me desempeño actualmente como comerciante, productor de Palma Africana y Ganadero. Me dirijo a usted con el respeto que se merece para hablarle sobre mi primo Midence Oqueli Martínez Turcios. Escribo esta carta desde lo más profundo de mi corazón, con la esperanza de que mis palabras puedan brindarle una mejor comprensión del ser humano que he conocido a lo largo de los años y de la persona excepcional que es Midence.

He tenido el privilegio de conocer a Midence desde que éramos niños. Siempre ha sido una persona muy cercana a su familia, respetuoso con los mayores y con un gran sentido de responsabilidad hacia sus seres queridos. Recuerdo cómo, desde muy joven, Midence se esforzaba por ayudar a sus padres y hermanos, a quienes siempre ha apoyado con compromiso y cariño.

Tras completar sus estudios secundarios por los años 80's, Midence ingresó a la Academia Militar de Honduras, donde se graduó y obtuvo siempre los primeros lugares durante su servicio, tuvo la honra de ser Guardia de Honor del presidente Carlos Roberto Reina, un reconocimiento que reflejaba su disciplina y compromiso. Sin embargo, decidió retirarse de la Academia Militar para dedicarse a otros proyectos. Heredo y Desarrolló con esfuerzo la ganadería, también se desenvolvió como transportista de equipo pesado (rastras), demostrando su capacidad emprendedora. Más adelante, incursionó en la política, desempeñándose como diputado en dos periodos, donde trabajó por el bienestar de su comunidad.

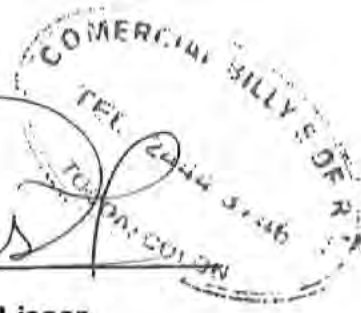

Como amigo y familiar, Midence siempre ha demostrado ser una persona confiable, generosa y solidaria. En momentos difíciles, él ha sido un gran apoyo para muchos de nosotros. Tiene una habilidad natural para escuchar, dar buenos consejos y ofrecer apoyo. Estas cualidades han hecho de él una persona querida no solo dentro de la familia, sino también en su comunidad. Además, Midence ha participado activamente en actividades de apoyo comunitario, como organizar eventos para la juventud de su comunidad.

Sé que este proceso ha sido muy doloroso tanto para él como para toda la familia. Nos ha afectado profundamente en lo emocional, y le aseguro que Midence, su madre e hijos han sentido el peso de esta situación. Este proceso también ha tenido un impacto devastador en la salud de su madre Emilia Turcios Orellana, quien ha sufrido enfermedades, consecuencia de la preocupación que este caso le ha causado, por lo que actualmente se encuentra en silla de ruedas, lo que ha añadido una carga emocional aún mayor a la familia.

Juez Kaplan, seguimos creyendo en mi primo. Sigo viendo en él al hombre bueno, trabajador y honesto que siempre ha sido. Por eso pido, con humildad, que tenga en cuenta su historia, su carácter, su dedicación a su familia y comunidad. Y el impacto considerando que la sentencia sea lo más justo posible para bien de toda su familia y amistades.

De antemano se le agradece por su decisión a tomar. Estoy convencido que con la oportunidad adecuada que usted le brinde el seguirá siendo el hombre humilde, trabajador, colaborador y amoroso con su familia, amistades y sociedad.

Lo saludo muy respetuosamente,



Óscar Funes Lisser
[Redacted]
Ofisier18@hotmail.com

TOCOA COLÓN

MAY 25, 2025

**HONORABLE LEWIS A. KAPLAN
UNITED STATES COURTHOUSE
Southern District of New York
500 Pearl St.
New York, NY 10007-1312**

Regarding: *United States v. Martínez Turcios*, 1:18-cr-00499 (LAK)

Dear Judge Kaplan:

I am writing to you with all due respect to talk about my cousin Midence Oquely Martínez Turcios. I write this letter from the depths of my heart, hoping that my words can provide you with a better understanding of the human being I have known throughout the years and of the exceptional person that Midence is.

I have had the privilege of knowing Midence since we were children. He has always been a person very close to the family, respectful of the elders, and with a great sense of responsibility towards his loved ones. I remember how, from a very young age, Midence strived to help his parents and siblings, whom he has always supported with commitment and affection.

After completing his studies, Midence entered the National Military Academy of Honduras, where he graduated and always obtained the top places during his service. He had the honor of being the Honor Guard of President Carlos Roberto Reina, a recognition that reflected his discipline and commitment. However, he decided to withdraw from the Military Academy to dedicate himself to other projects. He inherited and developed livestock farming with great effort. He also worked as a heavy equipment transporter, demonstrating his entrepreneurial ability. Later, he ventured into politics, serving as a congressman for two terms, where he worked for the well-being of his community and helped many people.

As a friend and family member, Midence has always proven to be a reliable, generous, and supportive person. In difficult times, he has been a great support for many of us. He has a natural ability to listen, give good advice, and offer support. These qualities have made him a beloved person not only within the family but also in his community. Additionally, Midence has actively participated in community support activities, such as organizing events for the children of his community.

I know that this ordeal has been very painful for him as well as for the whole family. It has deeply affected us emotionally, and I assure you that Midence has felt the weight of this situation. This ordeal has also had a devastating impact on the health of his mother Emilia Turcios, who has suffered serious illnesses as a result of the worry that this case has caused her, and she has been limited to a wheelchair, which has added an even greater emotional burden to the family.

Judge Kaplan, we still believe in my cousin. I still see in him the good, hardworking, and honest man he has always been. That is why I humbly ask you to take into account his history, his character, his dedication to his family and community, and the positive impact he has had on our lives when considering his sentence.

I am convinced that, by giving him the opportunity to return to the family, Midence will be an even better human being and will continue to be a valuable person for his family and his community, especially in these very difficult times for them. I greet you most respectfully.

Óscar Funes Lissner

[REDACTED]

Oflisser18@hotmail.com

TRANSLATION

HONORABLE LEWIS A. KAPLAN

UNITED STATES COURTHOUSE

Southern District of New York

500 Pearl St.

New York, NY 10007-1312

Referente a: United States v. Martinez Turcios, 1:18-cr-00499 (LAK)

Honorable juez kaplan Dios le bendiga grandemente su vida, soy tía política de Midence Martínez Turcios, Mi nombre es Marta Juárez, es un placer saludarlo, Midence es un ser humano muy especial, un excelente persona, un hombre muy servicial, muy educado, que siempre ha estado muy entregado a su familia y a las demás personas, le pedimos misericordia. Dios es grande y poderoso y confiamos que el señor nos ayude a que Midence estará pronto con su familia y amigos que lo esperamos y lo extrañamos, él es una persona con gran bondad, cariñoso, siempre pendiente de toda la familia. sabemos todo lo que dice la palabra todo lo podemos en Cristo que nos fortalece, yo le pido perdón por cualquier falta que él haya cometido y le pido misericordia para su Sentencia.

Atentamente

Martha juarez

Cel [REDACTED]

HONORABLE LEWIS A. KAPLAN
UNITED STATES COURTHOUSE
Southern District of New York
500 Pearl St.
New York, NY 10007-1312

Regarding: United States v. Martínez Turcios, 1:18-cr-00499 (LAK)

Honorable Judge Kaplan,

May God bless your life greatly. I am an aunt by marriage to Midence Martínez Turcios. My name is Marta Juárez. It is a pleasure to greet you. Midence is a very special human being, a great person, and a very helpful man who is always very polite. He has always been very dedicated to his family and to others. We ask you for mercy. God is great and powerful, and we trust that the Lord will help us so that Midence will soon be with his family and friends who are waiting for him and miss him. He is a person with great kindness, affectionate, always attentive to the whole family. We all know that the word says we can do all things through Christ, who strengthens us. I ask for forgiveness for any wrong he may have committed, and I ask for mercy for his sentence.

Sincerely,

Martha Juarez
Cell. [REDACTED]

EXHIBIT D

August 4, 2025

Honorable Lewis A. Kaplan
United States Courthouse
Southern District of New York
500 Pearl Street
New York, NY 10007

Dear Judge Kaplan:

The intended purpose of this brief letter is to notify the court of the tremendous changes I along with our fellow brothers in Christ, who have signed on to this letter with our attached signatures, have seen in our Pastor and brother Mr. Martinez. Our Lord has used him to guide us through faith and prayers. Our brother and Pastor is what we all consider a role model for all to follow.

On numerous occasions while preaching he has expressed his regret and repentance for his past mistakes and exorts us to do the same. Every time there is a new admit our Pastor advises them to seek the Lord and turn away from our old ways.

Our brother Martinez is and exceptional individual and has displayed this quality in very aspect of his life showing he is indeed a changed man.

As such we would like to humbly request that our brother in Christ Pastor Martinez be given the opportunity to be reunited with his family and continue with the new path our Lord has set him on in order to import the Lord's divine teachings.

1 JAMIL ABREU NAVARRO
 2 FREDDY MALDONADO VILLODA
 3 CESAR VALENCIA
 4 DAVID LORA
 5 ALEJANDRO ESTUPIÑAN
 6 MARCO VIDAL MENDOZ
 7 DE LA CRUZ VALDEZ LEWIS
 8 HERBERTH RODRIGUEZ
 9 ADONYS CASTILLO
 11 JEWELL WALCH
 12 DIMITRIE MARZAC
 13 WALTER ALFARO
 14 JUNIOR ZALAYA CANALES
 15 SHAQUAN LEE
 16 GARARD FEIAS
 17 JUAN MOISES PEREZ MENDOZ
 18 JAIME IBARRA WALLACE
 19 JAVIER SANKINS
 20 FERDINAN QUIÑONES
 21 ELIAS FARID GHONEU
 22 ARTEM STRYZHAK

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 56734208 Marco V.
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 03969070 *[Signature]*
 61537298 Jaime Ibarra Wallace
 45916511 *[Signature]*
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 JAMIL ABREU NAVARRO
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